



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E002/M-25-142

Requested By: Minnesota Public Utilities Commission

☐ Nonpublic ☒ Public

Date of Request: 5/4/2026

Date of Response: 5/18/2026

Response By: Sydnie Lieb, Ari Zwick

Email Address(es): Sydnie.Lieb@state.mn.us, Ari.Zwick@state.mn.us

Phone Number(s): 651-539-1035, 651-539-1675

Response to Request Number: 1

Request:

Please confirm the Dept's proposed "Planning Standard Review Process" would result in the Commission approving, modifying, or denying Xcel's "Planning Standards"

- A. If answer is yes, would the Department expect the Commission to enforce those standards?
 - i. If so, describe the regulatory proceedings and mechanisms the Department recommends the Commission use for any such enforcement.
 - ii. If not, please describe how the Commission would determine the effectiveness of the planning standard review process.
- B. If the answer is no, please describe what impact the planning standard review process would have.

Response:

A.
The answer is both yes and no. The Planning Standard Review Process would not require the Commission to approve Xcel's existing planning standards. The review process would only require the Commission to approve, modify, or reject requests to modify Xcel's planning standards.

As described in the Department's Response to Commission IR 6, the anticipated workgroup process will have limitations on the scope of the analysis that can be reasonably reviewed within the biennial IDP cycle. As a result, the Department assumes that most of Xcel's planning standards will not be reviewed, and an even smaller subset of standards will be available to analyze for potential modification studies.

No additional regulatory proceedings or mechanisms are necessary beyond the existing IDP docket.

B.
Not applicable.



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Response to Request Number: 2

Request:

Did the Department consult with any distribution planning engineers in writing its recommendations for the Planning Standard Review Process?

Response:

No, the Department does not currently have funding for distribution engineering consultation. The Department outlines the anticipated benefits of distribution planning engineers in its response to Commission IR 10.



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Response to Request Number: 3

Request:

Is the Department aware of any other state utility commission that approves utility planning standards similar to what it has recommended here?

Response:

The Department is not aware of any other state utility commission, other than Minnesota, that approves utility planning standards similar to what the Department recommends.



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Response to Request Number: 4

Request:

Has the Department requested copies of Xcel's Planning Standards for review?

Response:

No. The Department notes that without distribution planning engineers, copies of Xcel's planning standards have limited value. The Department's request for planning standard review focuses on planning themes, which encompass one or more planning standards that the Department expects Xcel to identify in the proposed workgroup. The Department's Recommendation F.1 states the themes that are requested for review:

The Department recommends the Commission order a review of the following capacity planning standards, to be presented in Xcel's 2027 IDP:

- A. Capacity forecasting and accuracy
- B. N-0 forecast uncertainty margin and the use of AMI or other actual data
- C. N-1 probability of coincident peak load and N-1 contingencies
- D. N-1 screening based on cost effectiveness
- E. Equipment ratings during N-1 emergencies
- F. Sizing new assets for future load growth
- G. Capacity Risk Framework
- H. Project Prioritization¹

Even if the Department were to review Xcel's planning standards, any actionable analysis would require direct involvement of Xcel engineers either in the Planning Standard Review Workgroup, or in the IDP comment process. See the Department's response to Commission IRs 6.C and 10 for additional details on why a planning standard review in isolation would deliver suboptimal outcomes compared to the workgroup.

¹ In the Matter of Xcel Energy's 2025 Integrated Distribution Plan, Department, Public Reply Comments, April 23, 2026, Docket No. E002/M-25-142, (eDockets) [20264-230826-02](#), at 79.



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Response to Request Number: 5

Request:

In reply comments recommendation C.1 the Department recommends the following:

The Commission shall create a formal workgroup and planning standard review process that shall:

- A. Identify the main system planning standards that Xcel uses for each Commission-approved review topic;
- B. Select one or more planning standards, in agreement with intervenors, to review before the next IDP;
- C. Set alternative system planning scenarios to analyze, in agreement with intervenors;
- D. Perform a quantitative analysis of alternative system planning standards that measure estimated costs and benefits of alternative system planning standards;
- E. Require Xcel to present the results of steps A-D in the next IDP cycle; and
- F. Request comments to approve, modify, or reject the revised system planning standards for each Commission-approved review topic.

Please confirm Staff's understanding of the proposed process is correct, and if not, clarify:

- A. "Commission-approved review topic" refers to the list of topics listed in recommendation C.2.
- B. The workgroup would identify the planning standards under the review topic to review before the next IDP.
- C. The workgroup would also decide on which alternative system planning scenarios to analyze.
- D. Xcel would perform a quantitative analysis of the existing and alternative standards.
- E. Xcel would include the results of the analysis in its subsequent IDP.
- F. In its notice for comment on the IDP, the Commission would include a question on whether it should approve, modify, or reject the alternative planning standard.

If the workgroup was not able to come to an agreement on which planning standards and alternative scenarios to analyze, who would determine which areas are reviewed?

Response:

A.
Correct. The Department Recommendation F.1 provides additional scope for the Commission-approved review topics, however the planning standard review process can take place without Department Recommendation F.1.



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-
- B.
Correct. The Department Recommendation F.1 provides additional scope for the Commission-approved review topics.
- C.
Correct. Please see the Department's response to Commission IR 6 for additional details.
- D.
Correct. Please see the Department's response to Commission IR 6 for additional details.
- E.
Correct.
- F.
Correct. The notice would request comments to approve, modify, or reject each modified planning standard that Xcel analyzed in the workgroup. Please see the Department's response to Commission IR 6 for additional details.
- G.
Please see the Department's response to Commission IR 6 for the answer to this question.²

² There is no subpart G. to the Commission's IR, however for organizational clarity, the Department responds to the final question in the IR in subpart G.



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Response to Request Number: 6

Request:

On page 11 of its Reply Comments, the Department stated its preference is for the Commission to lead the workgroup recommended in C.1

- A. Why does the Department recommend the Commission run the workgroup?
- B. What is the expected structure and time commitment of the workgroup and how does the Department propose the Commission procure sufficient resources to run the workgroup considering the Commission does not have the authority to seek technical assistance under Minn. Stat. 216B.62, Subd. 8?
- C. What is preventing the Department from running its own stakeholder process to investigate Xcel's planning standards and making recommendations to the Commission in future IDPs?

Response:

A.
Potential workgroup facilitators include the Commission, the Department, Xcel, or a neutral third-party. Upon further consideration and review, the Department believes that a neutral third-party facilitator is preferable because of expected facilitation time requirements and the appearance of bias or conflict of interest associated with Xcel- or Department-led facilitation.

Because the Commission leads other workgroups, the Department considers this option to be viable. However, as noted above, a neutral third-party facilitator provides other benefits as well, such as extending the resources of the Department and the Commission, and having a dedicated resource for what will likely be spirited discussions that involve significant stakeholder engagement. More importantly, a third-party meeting facilitator can provide a final report to the Commission on the workgroup process and outcomes for record development in the IDP docket.

Retention of a third-party facilitator would require procurement of professional and technical services, which were not previously requested in the Department's comments. Based on recent contracts for similar services, the Department recommends a budget not to exceed \$175,000. Given the potential impact of planning standard modifications, the Department believes the requested budget is reasonable to ensure the success of the planning standard review process.

B.
The Department provides an example of how the workgroup process could function. The Department's planning standard review recommendation is deliberately left open ended to allow the workgroup to modify its structure on the basis of emergent needs and schedules, however the following description provides the Department's expectation for workgroup process.



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In its Recommendation F.1, the Department provides a list of topics for planning standard review that forms the basis of discussion for the first Capacity planning standard review. The recommendation states:

F.1. The Department recommends the Commission order a review of the following capacity planning standards, to be presented in Xcel's 2027 IDP:

- A. Capacity forecasting and accuracy
- B. N-0 forecast uncertainty margin and the use of AMI or other actual data
- C. N-1 probability of coincident peak load and N-1 contingencies
- D. N-1 screening based on cost effectiveness
- E. Equipment ratings during N-1 emergencies
- F. Sizing new assets for future load growth
- G. Capacity Risk Framework
- H. Project Prioritization³

To facilitate future planning standard reviews, the Department expects that the Commission will approve similar lists of review topics on the 8-year review cycle to narrow the scope of the review.

The Department expects the workgroup to span approximately one year over the course of five phases: Recruitment, Education & Engagement, Scoping, Analysis, and Wrap Up, which is summarized in Table 1 below. Table 1 provides a sample schedule that outlines key milestone requirements for the workgroup.

³ In the Matter of Xcel Energy's 2025 Integrated Distribution Plan, Department, Public Reply Comments, April 23, 2026, Docket No. E002/M-25-142, (eDockets) [20264-230826-02](#), at 79.



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Table 1: Planning Standard Review Workgroup Sample Schedule and Time Requirements

Phase	Activity	Wk Start	Wk End	Duration (Wks)	Month											
					1	2	3	4	5	6	7	8	9	10	11	12
1. Recruitment	eDockets Sign Up	1	3	3												
	NDA Signed	1	3	3												
2. Education & Engagement	Education & Engagement Meeting 1	4	4	1												
	Education & Engagement Meeting 2	6	6	1												
	Education & Engagement Meeting 3	8	8	1												
3. Scoping	Initial Analysis Requests Filed	9	10	2												
	Xcel Estimation of Analysis Time for Each Request	11	14	4												
	Scoping Meeting 1	15	15	1												
	Revised Analysis Requests Filed	16	17	2												
	Xcel Estimation of Analysis Time for Each Request	18	19	2												
	Scoping Meeting 2	20	20	1												
	Rank Choice Voting	21	22	2												
4. Analysis	Xcel Analysis of Approved Modifications for Analysis	23	48	26												
	Standard Review Meeting 1 (Optional)	30	30	1												
	Standard Review Meeting 2 (Optional)	36	36	1												
	Standard Review Meeting 3 (Optional)	42	42	1												
5. Wrap Up	Xcel Writeup for Filing	49	52	4												
	Final Meeting	50	50	1												
Total	-	-	-	52												

In Phase 1 – Recruitment, each intervenor would submit a letter to the active IDP docket to request to participate in the Planning Standard Review Workgroup. Intervenors would also have to sign a non-disclosure agreement (NDA) to participate in the workgroup, which is estimated to take three weeks. The full phase would last three weeks.

In Phase 2 – Education & Engagement, a series of three Education and Engagement meetings would take place, the content of which will be provided by Xcel. The Department anticipates that each meeting would consist of an hour and a half to two hours of presentation about Xcel’s planning standards, and an additional hour and a half to one hour of discussion time, for a total of three hours per meeting. The meetings would be spaced two weeks apart to allow for information requests to be provided by Xcel either informally in the workgroup or through formal requests. The three meetings would span the breadth of planning standard topics, and would cover two or three topics from the Department Recommendation F.1 per meeting. The full phase would last five weeks.

In Phase 3 – Scoping, intervenors would have two weeks after the conclusion of the final Education and Engagement meeting to develop requests for analysis of modified planning standards. The requests would be



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submitted to the meeting facilitator to compile the full list of initial analysis requests. Xcel would then have four weeks to estimate the workload to complete each request, and Xcel would state how much total time is available for analysis requests, which would place a cap on total analysis time available for all requests. Xcel would also identify any requests that are technically infeasible, and provide justification for why these requests are infeasible. Xcel would present its results in the first Scoping Meeting and participants would be able to ask additional questions about their requests and estimated time requirements if they were to be modified in the second round of analysis request review. For example, if a request may take more time than is available, or if the request is infeasible, the participating stakeholder may seek feedback from Xcel about modifications that would result in a reduced scope of work or a technically feasible study. Stakeholders would then have an additional two weeks to revise their requests to resubmit to the meeting facilitator. Xcel would then have two weeks to revise its estimates in preparation for the second Scoping Meeting. Xcel would present its final estimated analysis times in the second Scoping Meeting, which would allow participants to withdraw any requests before voting. Withdrawal requests would be submitted to the meeting facilitator. Each Scoping Meeting is expected to take three hours.

The voting process, including final withdrawal of requests, would last two weeks. Rank choice voting offers one pathway that could be used to determine which modification requests are selected for analysis. The voting process would select the most favored options until all available analysis time has been exhausted. Ties are not expected, but if they occur, the ties can be broken by Xcel. It is important to highlight that in order to vote, stakeholders must only sign up for the workgroup, and do not need to participate in either the education meetings or in the scoping meetings to be able to vote. This feature addresses concerns raised by stakeholders about time commitments to participate in the Planning Standard Review Workgroup, such that these groups can still have a voice even if they only have limited resources to participate. The full phase would last fourteen weeks.

In Phase 4 – Analysis, Xcel would have six months to perform the analysis of approved planning standard modification requests. The Department suggests three optional Planning Standard Review meetings to make minor modifications to the requests throughout the analysis period, as time is available. The full phase would last 26 weeks.

In Phase 5 – Wrap Up, Xcel would have four weeks to complete the writeup of its planning standard review requests to be presented in the next IDP filing. Xcel should finish the analysis of the requests before Phase 5, and therefore this additional month is reserved for final write-up, revisions, and submission. Xcel would present its final results to the workgroup in a final meeting, which would allow stakeholders to ask questions about the final results before the results are filed to the IDP docket. In addition, should any of the final results indicate that discussion in the IDP comment period is unwarranted, the group may unanimously decide to withhold these modification requests from consideration in the IDP comment period. The full phase would last four weeks.

Finally, the Department reiterates its preference for third-party facilitation using its authority under Minn. Stat. § 216B.62, subd. 8, and an authorized budget not to exceed \$175,000.



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C.

The primary constraint preventing the Department from running the proposed workgroup is its lack of authority to require Xcel to participate, to provide data, and to provide analysis. At the very least, the Commission will have to order Xcel to fully participate in this effort to meet the objectives of planning standard review and participation in the workgroup. The analysis requested by the Department falls beyond the scope of information requests and therefore must be ordered by the Commission.

Even if the Commission approves the Department's request for engineering contractual services to review Xcel's planning standards, participation by Xcel engineers is still necessary. As the Department demonstrates in its initial comments, Xcel does not strictly follow its capacity planning standards.⁴ The contractor would not have access to the many data sources Xcel uses when it plans its distribution system. Additionally, it may be difficult for a contractor to fully understand the interactions of different standards without feedback from Xcel. Information requests are an imperfect tool to request data that may include multiple sources and jurisdictions that are impacted by specific planning standards. If the Department were to make a request to modify planning standards in an IDP comment period without Xcel's consultation, Xcel could refute or deny the request on the basis of engineering judgment, potentially generating a lengthy process of IRs and responses to get the needed information. This process could span several IDP cycles and could significantly delay potential modification requests. An engineering consultant can only enhance the planning standard review process, but cannot replace the role of Xcel to provide expert insight on how its system is planned holistically and how the system is maintained on a day-to-day basis.

⁴ In the Matter of Xcel Energy's 2025 Integrated Distribution Plan, Department, Initial Comments, February 27, 2026, Docket No. E002/M-25-142, (eDockets) [20262-228738-02](#) at 18-20.



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Response to Request Number: 7

Request:

In its Comments the Department recommends establishing an “Ad Hoc Review” process where stakeholders could request changes to standards.

- A. How does the Department suggest stakeholders make such a request, and how should the Commission handle these requests procedurally?
- B. What information and justification would an intervenor be required to provide when requesting a planning standard review?

Response:

A.
The Commission would allow for the submission of Ad Hoc review requests in eDockets during a specified period of time before the next biennial IDP filing is due. For example, stakeholders could submit a request in the month of October 2027 before the November 1st IDP filing is made. Each Ad Hoc review request would be incorporated into the Notice of Comment Period. Per the Department’s revised recommendation, each stakeholder could submit a maximum of one request per stakeholder. The three comment periods would allow other stakeholders, as well as Xcel, to reply to the request for the Ad Hoc review. Each review request would require approval, modification, or denial from the Commission. In addition, the Department recommends that the Commission approve a maximum of one request per IDP, and would be under no obligation to approve any requests.

While such planning standard review requests have thus far been limited to Planned Net Load (PNL), which was made in stakeholder initial comments, there are currently no limits to how many reviews can be requested by stakeholders.

B.
The only requirement for an Ad Hoc Planning Standard Review is the planning standard parameter or parameters requested for modification. In practice, all parties that submit a review request would provide justification for such requests in order to justify the time spent by Xcel to study the planning standard modification.

For example, the Department provides a roadmap in its initial comments for how a planning standard review request could be justified and requested. In its Initial Comments, the Department provides analysis of Xcel’s N-0 and N-1 planning standards and how Xcel’s budget could be modified if the standards were to be changed.⁵ If this

⁵ In the Matter of Xcel Energy’s 2025 Integrated Distribution Plan, Department, Initial Comments, February 27, 2026, Docket No. E002/M-25-142, (eDockets) [20262-228738-02](#) at 51-59.



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planning standard review request were to be requested as part of the Ad Hoc process, the Department could submit a recommendation that states:

The Department recommends the Commission order a planning standard review of Xcel's N-0 and N-1 capacity planning standards to modify both standards as follows:

- A. Modify the N-0 capacity planning standard from 75% to 80%.
- B. Modify the N-1 capacity planning standard to use emergency equipment ratings.

This example highlights a complex case where two planning standards are modified in unison to deliver one analysis and one result.

Ad Hoc Planning Standard Review Requests, as opposed to workgroup-based requests, require specificity of the parameters that must be modified. Ad Hoc requests require explicit knowledge of specific planning standards to request their modification.



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Response to Request Number: 8

Request:

On page 15 of the Department's April 23, 2026 Reply Comments it states:

The Department supports the removal of Xcel's IDP forecasting scenarios and NWA section. While hypothetical load growth scenarios are useful for planning purposes, these forecasts are not used for Xcel system planning. In addition, NWA has not produced meaningful cost savings for Xcel's ratepayers.

However, the Department also recommends:

- Requiring Xcel to consider reliability projects in its NWA (page 70)
- The creation of a new filing requirement to compare forecast scenarios to actual load results (page 33)

Please clarify how the Commission should interpret these opposing recommendations.

Response:

The Department's opposing positions reflect decision making under uncertainty. The Department's priority is for the Commission to approve the Department's planning standard review recommendations and to remove non-wires alternatives (NWA) analysis from the IDP Filing Requirements. However, if the Commission does not approve the planning standard review process, the Department foresees a need to enhance the NWA analysis process.

Regarding the second bullet point, the Department modified its recommendation in reply comments to decouple its forecast accuracy recommendation from the IDP forecast scenarios, and instead require forecast accuracy metrics for Xcel's forecast used for budgeting:

The Department recommends the Commission create a new IDP filing requirement to provide a comparison of forecast accuracy for the forecast scenario or scenarios Xcel uses for budgeting each vintage and scenario (IDP Low, Medium, High) in Xcel's LoadSEER forecasts compared to actuals. Forecast accuracy should adjust model parameters to actual observed conditions to determine the accuracy of the forecast.⁶

⁶ In the Matter of Xcel Energy's 2025 Integrated Distribution Plan, Department, Public Reply Comments, April 23, 2026, Docket No. E002/M-25-142, (eDockets) [20264-230826-02](#), at 33.



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The Department's revised recommendation is not in conflict with the potential removal of IDP forecast scenarios. The Department currently understands that some of the IDP forecast scenarios are not used for budgeting, and therefore are exploratory exercises in hypothetical outcomes. The Department is only concerned with reviewing the forecast or forecasts that Xcel relies on to make decisions that affect its budget in, for example, Xcel's capacity risk scoring methodology. Should Xcel explain that all of its forecast scenarios are used for budgeting, then the Department wants all of these forecasts to be reviewed for their accuracy.

The Department also notes that the potential rescission of IDP filing requirements would be a consensus-based process, and therefore the Department's preferences may not reflect the final filing requirements that are rescinded.



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Response to Request Number: 9

Request:

How does the Department currently review and make recommendations on distribution investments in cost recovery proceedings? How would the proposed Planning Standards Review Process change that analysis?

Response:

The Department reviews distribution investments in cost recovery proceedings based on the specific record developed in each case. That record may include the Company's petition, testimony, schedules, workpapers, information request responses, prior Commission orders, relevant IDP filings, and other supporting evidence. Within this context, the Department evaluates the particular investments for which recovery is sought, including whether the proposed investments and recovery treatment comply with applicable Minnesota statutes, Commission rules, and Commission orders; whether the Company has adequately supported the need, timing, and reasonableness of costs; whether investments are properly classified in rate base or expenses; whether expected benefits or offsets are appropriately reflected; and whether the proposed recovery treatment is justified under applicable ratemaking standards. Based on this review, the Department may recommend approval, modification, denial, deferral, additional reporting, or other conditions.

While the Department makes recommendations in the IDP that overlap in scope with cost recovery proceedings, the Department's planning standard review recommendations do not overlap in scope with cost recovery proceedings at all and will not affect how the Department or any other intervenor analyzes these proceedings. The best way to conceptualize the effect of modifications that result from planning standard reviews is to go upstream of a cost recovery proceeding. When Xcel forms its budgets, its engineers apply Xcel's planning standards to determine nondiscretionary system needs that are not suitable for cost recovery debates. Xcel then prioritizes the need for mitigations based on a multitude of factors. The validity of nondiscretionary needs is not discussed in a rate case; however, peripheral issues, as discussed in the previous paragraph, can be debated.

If a planning standard is modified by the Commission, its effect will materialize in a cost recovery proceeding via a modified budget request compared to how Xcel would plan its system under existing planning conditions. The modification of planning standards results in different nondiscretionary needs, which is how planning standard modifications affect Xcel's budget outside of cost recovery proceedings. The planning standard modifications provide non-redundant added value to cost recovery proceedings because modifications affect budget portfolios rather than specific projects that may require approval by the Commission. Planning standard modifications would allow the Commission to affect new portions of Xcel's budget, where the needs are a priori established in a cost recovery proceeding, and will remain as such if the Commission approves the Department's planning standard review recommendations.



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E002/M-25-142

Requested By: Minnesota Public Utilities Commission

☐ Nonpublic ☒ Public

Date of Request: 5/4/2026

Date of Response: 5/18/2026

Response By: Sydnie Lieb, Ari Zwick

Email Address(es): Sydnie.Lieb@state.mn.us, Ari.Zwick@state.mn.us

Phone Number(s): 651-539-1035, 651-539-1675

Response to Request Number: 10

Request:

The Department makes two requests for the Commission authorization to seek specialized technical assistance from the Commissioner of Management and Budget under Minn. Stat. § 216B.62, subd. 8 for a total of \$1.3 million. For each request, please provide:

- A. The duration over which the Department would expect to spend the funds
- B. Whether the Department would expect to need additional funding for future regulatory processes
- C. The types of experts and services the Department would expect to retain
- D. How the Department would manage review if it was unable to find technical assistance.

Response:

A.

Both requests for funding would span through the summer of 2028, when the Commission makes its decisions regarding capacity planning standards and wildfire. However, should the Commission accept the Department Recommendation A.1.B, which would delay the filing of all TEPs and IDP-Related Ad Hoc Filings until 2028, then the scope may be extended one year until the summer of 2029, depending on whether planning standards and wildfire are included with the even-numbered-year IDP filings or the odd-numbered-year Ad Hoc filings.

As stated by the Department in its reply comments, the Department's preference is A.1.A, which would keep all of Xcel's filings in 2027 and move all other utility filings to 2028.⁷ In this case, the planning standard contract would end in 2028 and the wildfire contract would end in 2029.

B.

The Department will evaluate the need for contracted services for future regulatory filings after completion of the first planning standard review and wildfire mitigation plan reviews. The Department notes that a consultant was hired in the previous two IDP cycles, but was not used in the current IDP cycle. After gaining further experience in each subject matter, the Department may prioritize internal resources in future filings to avoid the need for future contractual services. In addition, if the Commission and the Department see a need for continuous engineering review, the Department can evaluate the potential for adding a full-time staff engineer. Given the novelty in subject matter of both funding requests, contractual services offer the greatest near-term value.

⁷ In the Matter of Xcel Energy's 2025 Integrated Distribution Plan, Department, Public Reply Comments, April 23, 2026, Docket No. E002/M-25-142, (eDockets) [20264-230826-02](#), at 5.



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C.

For planning standard review recommendations, the Department seeks the services of certified distribution system engineers. These engineers will possess the ability to review Xcel's planning standards, analyze data provided by Xcel, make recommendations for planning standard reviews, provide modeling as needed, review Xcel's analyses of modified planning standards, and will serve as subject matter experts in Xcel's 2027 IDP proceeding.

For the wildfire mitigation plan recommendation, the Department seeks the services of wildfire mitigation plan experts, similar to the scope of work performed in Xcel's rate case, but with enhanced focus on risk and damage quantification, alternative mitigation strategies, cost benefit analysis, and sensitivity analysis.⁸ For the first iteration of wildfire mitigation plans, it is essential to establish a reasonable baseline for the quantitative risk and damages that wildfire poses, as well as the quantification of different strategies to mitigate that risk.

D.

The Department's planning standard review recommendations do not require review by contracted distribution engineering consultants. The process is designed around Xcel engineers, who are a critical and irreplaceable component of the planning standard review process. However, without an engineering consultant, the Department would be forced to accept Xcel's engineering arguments because the Department does not have the expertise to challenge engineering assumptions, leading to a lack of analysis of feasible alternative planning standards that could add significant value to the review process. The engineering consultant would also provide more precise and more effective modifications for study that the Department would not recommend on its own. Finally, should Xcel be opposed to the modification of a planning standard based on engineering feasibility, an engineering consultant can defend the reasonableness of a modification that the Department cannot provide.⁹

The Department's wildfire mitigation plan recommendation also does not require the participation of a consultant. If contracted services are not obtained, the Department would rely on the wildfire analysis performed in Xcel's rate case as a starting point for its analysis.¹⁰ The Department would be more likely to accept risk quantification and valuation provided by the utilities, which would establish a precedent for the analysis of future wildfire mitigation plans. Generally, the Department's analysis would be more reliant on analysis provided by utilities, would be more limited in scope, and would lack subject matter expertise, particularly in the comparison of utility mitigation strategies to each other and to those in jurisdictions outside of Minnesota. As a result, utilities may be able to propose more wildfire mitigation expenses with less justification.

⁸ *In the Matter of the Application of Xcel Energy, for Authority to Increase Rates for Electric Service in Minnesota*, Surrebuttal Testimony and Attachments of Eric Borden, Department, November 25, 2025, Docket No. E002/GR-24-320, (eDockets) [202511-225277-03](#); *In the Matter of the Application of Xcel Energy, for Authority to Increase Rates for Electric Service in Minnesota*, Direct Testimony and Attachments of Eric Borden, Department, November 25, 2025, Docket No. E002/GR-24-320, (eDockets) [20258-222346-11](#). (Hereinafter "Borden Direct and Surrebuttal Testimony").

⁹ While the planning standard review process eliminates infeasible modifications, Xcel may still oppose the modification of a standard with engineering judgment based on other factors.

¹⁰ Borden Direct and Surrebuttal Testimony.