



414 Nicollet Mall
Minneapolis, MN 55401

May 13, 2025

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: RESPONSE COMMENTS
DOCKET NO. E,G999/PR-25-2

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these Response Comments pursuant to the Public Utilities Commission's February 28, 2025 *Notice of Comment Period* (Notice) in the above-noted docket.

We respond below to each question in the "Topics for Utilities" section of the Notice. As described below, the Company has already complied with each of the requests made by Citizens Utility Board (CUB) and Legal Services Advocacy Project (LSAP).

1. Per Appendix A, Request #1, would your utility submit a compliance filing in the instant docket detailing its current policies and practices on disconnections, service deposits, and payment agreements?

CUB and Energy CENTS Coalition (ECC) made a similar request of Xcel Energy in response to our 2023 Annual Report on Electric Safety, Reliability and Service Quality (Docket No. E999/M-24-27). The Commission's January 13, 2025 Order in that docket required, at Order Point 23:

23. Xcel must make a filing in the instant docket and Docket E,G-999/PR-24-02 detailing its current disconnection policies and practices, and require Xcel to submit additional filings in Docket E,G-999/PR-YR-02 when there are changes to those policies and practices within 20 days of the Order.

Xcel Energy met this requirement on January 31, 2025 by making a compliance filing in both E999/M-24-27 and E,G999/PR-24-02. We provided a *Minnesota Disconnection Process* document that details our policies and practices related to disconnection and payment arrangements for Minnesota residential customers. The document includes changes we agreed to with CUB and ECC in the Electric Safety, Reliability and Service Quality docket, and implemented beginning early in 2025, that are designed to help customers enter into payment arrangements that work for them, connect them with energy assistance and the Company's own affordability programs, and ultimately improve customers' ability to avoid disconnection.

In response to that filing, CUB requested clarifications on how the Company considers both household financial circumstances and extenuating circumstances when offering payment arrangements, and whether consideration of those circumstances may lead to offering down payments lower than the amounts listed in the *Minnesota Disconnection Process* document. The Company does offer individualized payment arrangements, including down payments lower than those reduced amounts, on a case-by-case basis in consideration of both household financial circumstances and extenuating circumstances. We agreed this was not entirely clear in our January 31 filing, so we filed a corrected *Minnesota Disconnection Process* document in the same two dockets on March 3, 2025.¹

Going forward, if the Company makes changes to our disconnection policies and practices, per the Order Point above we will submit a filing in Docket E,G999/PR-YR-02 to document those changes.

2. Per Appendix A, Request #2, would your utility display its disconnection, service deposit, and payment agreement policies and practices on your website, and explain those procedures in clear, easy-to-understand language?

CUB and ECC made a similar request of Xcel Energy in our 2023 Annual Report on Electric Safety, Reliability and Service Quality (Docket No. E999/M-24-27). The Commission's January 13, 2025 Order in that docket required, at Order Point 22:

22. Xcel must publish its disconnection and payment agreement policies and practices on its website.

¹ *In the Matter of Northern States Power Co. d/b/a Xcel Energy – Electric's 2023 Annual Safety, Reliability, and Service Quality Report* and *In the Matter of Cold Weather Reports (CWR) – Regulated Gas & Electric Companies*, Docket Nos. E002/M-24-27 and E,G002/PR-24-02, CORRECTED COMPLIANCE FILING (March 3, 2025).

The Company met this requirement on March 1, 2025 by posting the *Minnesota Disconnection Process* document developed for Order Point 23 on our website, in two locations where we believe customers wishing to understand how to avoid disconnection might intuitively look for it: <https://mn.my.xcelenergy.com/s/billing-payment/energy-assistance/pay-arrangements> and <https://mn.my.xcelenergy.com/s/billing-payment/manage-bill>.

3. Per Appendix A, Request #3, would your utility post the mock language from CUB and LSAP on its website?

CUB's requested language is:

- a. Under Minnesota law, [UTILITY NAME] customers are entitled to a payment agreement for the payment of overdue bills. This payment agreement must consider a customer's financial circumstances and any extenuating circumstances of the household.*
- b. If the payment agreement terms offered are not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a(n) [UTILITY NAME] customer account representative at [PHONE NUMBER and/or EMAIL ADDRESS].*
- c. If you are unable to reach a mutually agreeable arrangement with a customer account representative, you may appeal the decision with the Minnesota Public Utilities Commission's Consumer Affairs Office. The Consumer Affairs Office can be contacted at 651-296-0406 or 800-657-3782, or by email at consumer.puc@state.mn.us.*

CUB and ECC made a similar request of Xcel Energy in our 2023 Annual Report on Electric Safety, Reliability and Service Quality (Docket No. E999/M-24-27). The Commission's January 13, 2025 Order in that docket required, at Order Point 22:

- 22. ... Subject to technical feasibility, Xcel shall make the edits discussed in ECC/CUB's September 12, 2024 comments to its payment agreement webpage.*

The language in ECC/CUB's September 12, 2024 comments mirrored what is proposed by CUB and LSAP above. In response, the Company included this language on our website as of March 1, 2025. The language reads exactly as above, substituting in the Xcel Energy-specific information. See [Payment Arrangements | Billing & Payment | Xcel Energy](#).

- 4. As CUB and LSAP have only recommended the actions listed in Appendix A, and these actions have *not* been Ordered by the Commission, if your utility would *not* voluntarily comply with the Requests 1-3, please discuss why doing so is unfeasible or inappropriate.**

As discussed above, Xcel Energy has already complied with Appendix A, Requests 1-3.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at Nicholas.f.martin@xcelenergy.com or (612) 330-6255 or Christine Schwartz at christine.e.schwartz@xcelenergy.com or (612) 330-6193 if there are any questions regarding this submission.

Sincerely,

/s/

NICHOLAS MARTIN
DIRECTOR, STRATEGIC OUTREACH & ADVOCACY
NSPM REGULATORY

cc: Service List

CERTIFICATE OF SERVICE

I, Victor Barreiro, 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,G999/PR-25-2

Dated this 13th day of May 2025

/s/

Victor Barreiro
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	PR-25-2
2	Ryan	Baumtrog	ryan.baumtrog@state.mn.us		Minnesota Dept of Housing	400 Wabasha St N Ste 400 St. Paul MN, 55102 United States	Electronic Service		No	PR-25-2
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
4	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	PR-25-2
5	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
6	Beverly	Dahlberg	bevdahlberg@nweco.com	Northwestern Wisconsin Electric Co.		104 South Pine Street P O Box 9 Grantsburg WI, 54840-0009 United States	Electronic Service		No	PR-25-2
7	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	PR-25-2
8	Ron	Elwood	relwood@mnlisap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	PR-25-2
9	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	PR-25-2
10	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
11	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	PR-25-2
12	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	PR-25-2
13	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	PR-25-2
14	Collin	Kremeier	ckremeier@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-	Electronic Service		No	PR-25-2

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						0496 United States				
15	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
16	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	PR-25-2
17	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
18	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	PR-25-2
19	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
20	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	PR-25-2
21	Jodi	Schinzing	jodischinzing@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine Street Grantsburg WI, 54840 United States	Electronic Service		No	PR-25-2
22	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	PR-25-2
23	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	PR-25-2
24	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PLE Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	PR-25-2
25	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	PR-25-2
26	Katherine	Teiken	katherine.teiken@state.mn.us			400 Wabasha St N Suite 400 Saint Paul MN, 55102 United States	Electronic Service		No	PR-25-2