

**In the Matter of Northern States Power Co.'s, d/b/a Xcel Energy's, Petition for Approval of Large General Time of Day Service customers and Large Peak Controlled Time of Day Service Tariffs**

**PUC Docket Number: E002/M-25-289**

LIUNA Minnesota and North Dakota appreciates the opportunity to offer proposed decision options to the Minnesota Public Utilities Commission ("Commission") on the petition filed by Xcel Energy ("Xcel") for approval of a new tariff designed to support the addition of new load from data centers and other large electricity customers while protecting existing customers from risks associated with investments required to serve such loads ("large load tariff").

Consistent with our supplemental comments, we recommend that the Commission's Order in this matter explicitly recognize that the approved terms are appropriate and can be expected to maximize public benefits within the context of Xcel's system, and under current favorable market conditions, but that the Commission may find that other terms are appropriate for another utility or under different market conditions.

LIUNA DO1 - While approval of this tariff for Xcel Energy may inform Commission decisions on the proposed large load tariffs of other utilities, approval of this tariff should not be viewed as precedent for other utility large load tariffs.

LIUNA DO2 - Approval of Xcel Energy's tariff does not preclude future proposed modifications to the tariff in recognition of changing market dynamics or other factors relevant to the public interest.

We thank the Commission for its consideration.

Dated: March 27, 2026

Respectfully Submitted,  
LIUNA Minnesota & North Dakota

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