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March 2, 2026

Ms. Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

*Via eDockets*

**Re: *In re N. States Power Co. d/b/a Xcel Energy's Petition for Approval of the Transmission Cost Recovery Rider Rev. Req. for 2026, Tracker True-Up, and Revised Adj. Factors***  
**MPUC Docket No. E-002/M-25-386**

Dear Ms. Bergman:

The Office of the Attorney General, Residential Utilities Division (OAG) respectfully submits this letter requesting consideration of additional decision options at the Commission's March 5, 2026 agenda meeting for the above-referenced docket. The OAG's comments included recommendations regarding treatment for Xcel's current Transmission Cost Recovery (TCR) and a recommendation on requirements for updating allocators in future TCRs. Because these recommendations are not included in the current version of the briefing papers, the OAG provides the below alternative decision options. The rationale supporting these decision options is included in the OAG's initial comments at the referenced location.

**OAG New 3a.** Reject Xcel's proposed change to use the C12WM allocator for AMI costs and instead classify AMI costs as one-third each customer-related, demand-related, and energy-related, and use the C12WM allocator for customer-related costs, the E8760 allocator for energy-related costs, and the D10S allocator for demand-related costs.<sup>1</sup> (OAG Primary)

**OAG New 3b.** Reject Xcel's proposed change to use the C12WM allocator for AMI costs and continue to use the P60 allocator for these costs.<sup>2</sup> (OAG Alternate)

**OAG New 4.** Require Xcel to update the class allocators used to allocate TCR Rider costs to reflect customer count, energy sales, and class demand forecast data corresponding to the year(s) included in future TCR Rider petitions.<sup>3</sup> (OAG)

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<sup>1</sup> [OAG Initial Comments](#) at 2-11 (Jan. 5, 2026). Although the OAG did not specifically recommend using the D10S peak demand allocator in comments as the OAG has challenged Xcel's choice of a peak hour in the rate case, we do not oppose using Xcel's TCR D10S allocator for the relatively short amount of time before AMI costs are likely to be rolled-in to Xcel's base rates.

<sup>2</sup> [OAG Initial Comments](#) at 2-7 (Jan. 5, 2026).

<sup>3</sup> [OAG Initial Comments](#) at 11-12 (Jan. 5, 2026).

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Thank you very much for your time and attention to this matter. By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/Katherine Hinderlie

KATHERINE HINDERLIE

Manager, Residential Utilities Division

Assistant Attorney General

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**CERTIFICATE OF SERVICE**

**Re: *In re N. States Power Co. d/b/a Xcel Energy's Petition for Approval of the Transmission Cost Recovery Rider Rev. Req. for 2026, Tracker True-Up, and Revised Adj. Factors***  
**MPUC Docket No. E-002/M-25-386**

I, KATHERINE HINDERLIE, hereby certify that on the 2nd day of March, 2026, I e-filed with eDockets *Proposed Decision Options of the Office of the Attorney General—Residential Utilities Division*, and served a true and correct copy of the same upon all parties listed on the attached Service List by e-mail, electronic submission and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

*s/ Katherine Hinderlie* \_\_\_\_\_  
KATHERINE HINDERLIE

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9	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	M-25-386
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18	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07- MCA Minneapolis MN, 55401 United States	Electronic Service		Yes	M-25-386
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21	Carol A.	Overland	overland@legalectric.org	Legaelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25-386
22	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	M-25-386
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24	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-386
25	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-386
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29	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25- 386