



CITIZENS UTILITY BOARD

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July 10, 2025

VIA E-FILING

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

Re:

**In the Matter of Northern States Power
Company d/b/a Xcel Energy's 2024 Annual
Safety, Reliability, and Service Quality
Report**

**MPUC Docket No.
E-002/M-25-27**

Dear Executive Secretary,

The Citizens Utility Board of Minnesota ("CUB"), the Energy CENTS Coalition ("ECC"), and the Legal Services Advocacy Project ("LSAP," collectively, the "Joint Commenters") respectfully resubmit the following Decision Option in recognition of the upcoming hearing on the above-referenced matter.

Several aspects of the Joint Commenters' Reply Comments were not fully represented in Staff's Briefing Papers. Specifically, we advocated for a process that would allow the Commission to fully implement the proposed extreme heat and Air Quality Index ("AQI") protections while enabling continued engagement with the Minnesota Pollution Control Agency ("MPCA") and the Minnesota Department of Health ("MDH"). We appreciate MDH's contributions to the record, and recognize the agency's desire to ensure AQI protection thresholds are reflective of current calculation methodologies and scientific understandings. While changes to AQI methodologies may necessitate modifications to protection thresholds at some point in the future, we do not believe that eventuality warrants delaying the implementation of protections at this point in time. For this reason, the Joint Commenters proposed the following course of action in Reply Comments and resubmit Decision Option 8B for the Commission's consideration:

NEW 8B: Require Xcel to consult with MDH and MPCA about whether AQI changes or advancements in the understanding of health impacts from air pollution and extreme heat might warrant modification of protection thresholds. Require Xcel to report on these discussions in future SRSQ reports, together with any modifications proposed by the Company or agencies.

We view this approach as streamlining extreme heat and AQI protection implementation by not requiring agency consultation at the outset. At the same time, it would facilitate ongoing

engagement between the Company, MPCA, and MDH to ensure protection thresholds are reflective of the most up-to-date scientific information. If adopted by the Commission, this Decision Option would serve as an alternative to the procedural pathways identified in Decision Options 6, 7, and 8.

The Joint Commenters appreciate the Commission's close consideration of these pressing issues and will be available for questions.

Sincerely,

July 10, 2025

/s/ Brandon Crawford

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STATE OF MINNESOTA BEFORE THE PUBLIC UTILITIES COMMISSION

In the Matter of Northern States Power
Company d/b/a Xcel Energy's 2024 Annual
Safety, Reliability, and Service Quality Report

Docket No. E-002/M-25-27

CERTIFICATE OF SERVICE

I, Brandon Crawford, hereby certify that I have served a true and correct copy of the following documents to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

1. Letter of the Citizens Utility Board of Minnesota, Energy CENTS Coalition, and Legal Services Advocacy Project

Dated this 10th day of July, 2025.

/s/ Brandon Crawford

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