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Schedules to Direct Testimony of Shoua Lee
CAH Docket No. 21-2500-40336
MPUC Docket No. E-002/AA-22-179

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Xcel Energy		Information Request No.	46
Docket No.:	E002/AA-22-179		
Response To:	Minnesota Department of Commerce		
Requestor:	Richard Dornfeld & Katherine Arnold		
Date Received:	June 3, 2025		

Question:
Topic: HDD contractor

(a) Identify the contractor or contractors who performed the horizontal directional drilling that struck Prairie Island Nuclear Generating Plant's DC control cables on October 19, 2023.

(b) Provide a mailing address, telephone number, and e-mail address for each entity responsive to subpart (a).

Response:

a) The horizontal directional drilling that struck the DC control cables on October 19, 2023 was performed by Xcel Energy Distribution Electrical Underground Construction (EUC). This group was considered a contractor because they are outside of the Xcel Energy Nuclear business unit.

b) The contact information for EUC is the same as Xcel Energy.

Witness:	n/a
Preparer:	Amanda Jepson
Title:	Manager, Nuclear Regulatory Policy
Department:	Nuclear Policy Planning
Telephone:	(651) 212-1679
Date:	June 13, 2025

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Xcel Energy		Information Request No.	9
Docket No.:	E002/AA-22-179		
Response To:	Minnesota Office of the Attorney General		
Requestor:	Judy Sigal		
Date Received:	June 2, 2025		

Question:

Reference:

- Detmer Direct at 20, which states, "By pulling forward these projects from planned future outages, customers received a measurable benefit by avoiding future incremental power costs associated with those future outages."
- Detmer Direct Schedule 2, pages 9-10 (listing pulled-forward work)
- Detmer Direct Schedule 2, page 11 (calculating outage days for pulled-forward work)

A. Explain the relationship between an outage day and a calendar day.
B. Did pulling forward work from planned future outages lengthen the outage in this case? If not, why not? If so, by how many calendar days? Explain how the calendar days were calculated and provide the calculation.
C. Did pulling forward work from planned future outages shorten the planned future outages? If so, by how many calendar days? Explain how the calendar days were calculated and provide the calculation.
D. For each planned future outage listed in Detmer Direct Schedule 2 at 9–10 (i.e., in Column 3), provide:
    1. The purpose(s) of the planned future outage that pulled-forward work was originally scheduled for (e.g., refueling, maintenance, upgrades, inspections).
    2. Whether the planned future outage was avoided in its entirety by pulling forward work to the outage in this case.
    3. If the planned future outage was not avoided in its entirety, the actual duration of the planned future outage in calendar days (or estimated duration if the planned future outage has not yet occurred).
    4. If the planned future outage was not avoided in its entirety, the details of any other work scheduled for the planned future outage that was not pulled forward, including the actual or estimated number of labor hours associated with that other work.
E. Identify each planned outage at Unit 1 or Unit 2 for the period from January 1, 2015 to date. For each planned outage, provide:

1. The start date;
2. The purpose of the outage;
3. Whether any cables were replaced during the outage;
4. The duration of the outage in calendar days; and
5. The total number of internal and contract labor hours associated with the outage.

Any responsive documents must be provided in their unlocked native format with all formulas and links intact.

Response:

A. An outage day is equivalent to a 24-hour period, and it is specifically a reference to all of the outage-specific activities going on during that day. The first outage day, for example, starts from the time that the breaker opens and the unit comes offline to 24 hours after that specific activity.

B. No, pulling this work forward did not increase the length of the outage. The critical path work (i.e., work that drove the outage duration) was the cable replacement work, and in particular the testing. This additional outage time provided the opportunity to perform additional work that was scheduled in the future and compatible with the critical path work.

   In terms of how the outage days were calculated to account for this pulled-forward work, this calculation was previously discussed and provided in the Direct Testimony of Company witness Nicholas Detmer (Detmer Direct), Schedule 2 pages 5 and 989. First, we determined the average labor hours worked during one outage day by dividing the total approximate hours worked over the course of the outage by the total outage days (141,796 divided by 135 equals 1,050 hours). The total approximate labor hours of the work that was pulled forward into the outage was 8,505 labor hours. This number was divided by the average labor hours worked per outage day to arrive at 8.1 outage days for pulled forward work.

C. Typically refueling activities and major projects drive outage schedules (i.e. critical path projects). For the work pulled forward that required a dual unit shutdown, this was critical path and did avoid having to shut down a unit while in a future refueling outage. The combined approximate labor hours for this dual unit shutdown work is 2,272 labor hours. Divided by the 1,050 average daily labor hours worked for 1 outage day, this work reduced the future outage by approximately 2.2 outage days. See Detmer Direct, Schedule 2 page 3. The rest of the pulled forward work was not critical path, so it likely would not have changed the total length of any future outage(s). The benefit of pulling this

work forward is improved plant reliability and lowered risk for potential future outages, derates, or other online or outage non-critical path maintenance.

D. The Company assumes this question is referring to column 2 of Detmer Direct Schedule 2 at 987-988, which identifies the future planning from which work was pulled forward. The Company responds to subparts 1-4 in Table 1 below, which identifies each of the future planned outages or workstreams from which work was pulled forward.

Table 1

When Work Was Otherwise Scheduled to Take Place (future)	Purpose	Avoided in Its Entirety?	Actual Duration	Other Work & Duration
1R34 - 9/2024	Refueling and Baffle Former Bolt/Clevis Bolt Replacement Project	No	119 outage days	RCP seal replacements; control valve repair, Ovation software correction, single point vulnerability risk elimination on feedwater system, control damper inspection, circulating water pump motor troubleshooting, and hundreds of other outage activities/tasks (162,244 labor hours)
Online[1] - WW2402 (2nd week of January 2024)	Replace circulating water valve and pipe	Yes	98 labor hours	N/A
Online - Pre 1R34 (August 2024)	Outage preparation including solenoid valve replacement and control valve repair	Yes	284 labor hours	N/A
Online ; Winter 2024	Non-destructive examination of the motor driven cooling water pump baseplate	Yes	8 labor hours	N/A
Online ; Q1 2025	Cooling water strainer recurring inspection and maintenance; solenoid valve replacement	Yes	253 labor hours	N/A
On dual unit forced outage list	Pipe replacement on cooling water system	Yes	1,820 labor hours	None
Online; Q1 2025 (preference for dual unit outage)	plant screenhouse stop log rail guide inspection	Yes	452 labor hours	N/A
Online ; Q2 2025 (derate required)	Condenser in and outer pass cleaning	Yes	674 labor hours	N/A
2/5/24 (WW2405)	Switchyard relay actuation and inspection, replace bird spikes near transformer; electrical inspection and maintenance on Unit 2 auxiliary and main transformer and breaker internal inspection	Yes	1,927 labor hours	N/A

[1] "Online" work refers to planned future work that would occur online but would not require a unit shutdown.

When Work Was Otherwise Scheduled to Take Place (future)	Purpose	Avoided in Its Entirety?	Actual Duration	Other Work & Duration
Q1 2024	Cooling water strainer and breaker inspection; solenoid valve replacement	Yes	137 labor hours	N/A
Online D6 Diesel OOS Window - Q1 2025	Diesel maintenance window	Yes	162 labor hours	N/A
2R34 (10/2025)	Refueling outage	No	Planned 30 outage days	Refueling and outage maintenance and testing activities (final scoping is still in progress- early estimated labor hours 55,000)

E. The Company responds to subparts 1-5 in Table 2 below, which identifies each planned outage at Unit 1 or Unit 2 for the period from January 1, 2015 to date.

Table 2

Outage Start Date	Outage Purpose	Cables Replaced? Y/N	Planned Outage Duration in Days	Actual Duration in Outage Days	Planned Labor Hours	Estimated Labor Hours[2]
1/26/2015	Unit 1 Maintenance Outage for 12 Reactor Coolant Pump Seal Replacement and Flushing	N	N/A	16.21	2,760	N/A
4/7/2015	Unit 1 Maintenance Outage for 12 Reactor Coolant Pump Seal Replacement and Flushing	N	N/A	32.02	2,958	N/A
10/17/2015	Unit 2 Cycle 29 Refueling Outage	N	34.63	49.72	102,694	147,443
10/15/2016	Unit 1 Cycle 30 Refueling Outage	Y	35	36.68	94,764	99,313
10/13/2017	Unit 2 Cycle 30 Refueling Outage	Y	28.25	37.86	76,026	101,888
9/21/2018	Unit 1 Cycle 31 Refueling Outage	Y	35.67	34.80	105,198	102,632
10/28/2019	Unit 2 Cycle 31 Refueling Outage	Y	25	23.20	51,774	48,046
9/18/2020	Unit 1 Cycle 32 Refueling Outage	N	24.79	24.70	46,826	46,656
10/1/2021	Unit 2 Cycle 32 Refueling Outage	N	26.79	28.40	53,745	56,975
10/14/2022	Unit 1 Cycle 33 Refueling Outage	N	24.71	25.95	62,022	65,134
10/6/2023	Unit 2 Cycle 33 Refueling Outage and Baffle Former	Y	63	147.45	75,776	177,352[3]

[2] Due to limited access of vendor contracts and vendor labor hour data, this is an estimate. We divided the "Planned Labor Hours" column by the "Planned Outage Duration in Days" column to get the daily planned labor hours. We then took this estimate and multiplied it by the Actual Duration in Outage Days to get the last column, "Estimated Labor Hours."

[3] The labor hours for the 2023 outage were estimated to be an average of 1,202.8 labor hours daily using the entire 147.45 U2 outage duration. The 1,050 daily average labor hours used in previous calculations (i.e., for

Outage Start Date	Outage Purpose	Cables Replaced? Y/N	Planned Outage Duration in Days	Actual Duration in Outage Days	Planned Labor Hours	Estimated Labor Hours[2]
	Bolt/Clevis Bolt Replacement Projects					
9/20/2024	Unit 1 Cycle 34 Refueling Outage and Baffle Former Bolt/Clevis Bolt Replacement Projects	Y	63	118.95	85,930	162,244

Witness: Nicholas J. Detmer
Preparer: Amanda J. Jepson
Title: Manager, Nuclear Regulatory
Department: Nuclear Regulatory Policy
Telephone: (651) 212-1679
Date: June 13, 2025

work pulled forward) was calculated based on the start of the DC cable replacement outage, so initial Unit 2 Refueling Outage shutdown and defueling activities were not included. During this time period, many of the refueling and valve maintenance contractors were sent home, leading to the lower daily average labor hours calculated for work pulled forward.

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Xcel Energy		Information Request No.	51
Docket No.:	E002/AA-22-179		
Response To:	Minnesota Department of Commerce		
Requestor:	Andrew Golden		
Date Received:	June 6, 2025		

Question:
Topic: Avoided Future Costs Due to Work Performed During Outage
Reference(s): Detmer Direct at 20; Exhibit___(NJD-1), Schedule 2 at 5 and Attachment B

Witness Detmer states the Company avoided 8.1 future outage days due to work completed during the PINGP outage that would have been completed during a future planned outage. Some of this work was scheduled to take place prior to the filing of the Witness' testimony per Exhibit___(NJD-1), Schedule 2, Attachment B.

- Please confirm those outages were in actuality shorter than otherwise planned as a result of this work completed during the 2023-2024 outage.
- Please provide Xcel's 2025 outage forecast related to the PINGP outage approved in its 2025 Fuel Forecast, and compare to the actual outage time, then explain causes for differences.
- Please provide all inputs and assumptions used in this calculation, as well as any relevant spreadsheets with formulas included, and explain for each one, why they are reasonable.
- Please provide support the jurisdictional allocator used and why it is reasonable, in determining $2.4 million total company amount compared to the $1.8 million Minnesota jurisdictional amount.

Response:
Xcel Energy objects to DOC Information Request No. 51 as vague, mischaracterizing testimony, and calling for speculation. Without waiving the foregoing objection, Xcel Energy responds as follows:

A) Work pulled forward is discussed in more detail, including impact on outage duration, in the Company's response to OAG IR No. 9, which is incorporated by reference.

B) The planned 2025 PINGP outage forecasted in Docket No. E002/AA-24-63 is scheduled to start in October 2025 for a duration of 30 days and has therefore not yet occurred.

C) The Company assumes this subpart refers to the inputs and assumptions used in the calculation of the pulled forward work. This information, including why the assumptions are reasonable, is discussed in the Company's response to OAG IR No. 9, which is incorporated by reference.

D) Please see Attachment A to DOC IR No. 49 for supporting documentation for the allocator used. As can be seen in the attachment, the allocator is based on forecasted sales for the NSP system in 2029. Fuel clause costs have historically been allocated to each state using sales, so this allocator is consistent with that treatment.

Witness:	n/a	
Preparer:	Amanda Jepson	Nick Paluck
Title:	Manager, Nuclear Regulatory Policy	Manager, Regulatory Analysis
Department:	Nuclear Policy Planning	NSPM Regulatory
Telephone:	(651) 212-1679	(612) 330-2905

As to objections:

Preparer:	Lauren Steinhaeuser
Title:	Assistant General Counsel
Department:	Legal Services
Telephone:	lauren.steinhaeuser@xcelenergy.com
Date:	June 18, 2025

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Xcel Energy		Information Request No.	4
Docket No.:	E002/AA-22-179		
Response To:	Minnesota Office of the Attorney General		
Requestor:	Judy Sigal		
Date Received:	June 2, 2025		

Question:
Reference: Expert report of Allen L. Hiser at 17

Report states that the SLR process scenario is "predicated on the degradation of the DC control cables not being identified prior to entry to SLR, and the state of knowledge on the condition of the cables and their degradation progression limited to that known before October 19, 2023."

A. Absent the Event occurring, and assuming inclusion of the DC control cables in the commodity group sample selected for SLR testing, when would testing of the control cables likely have occurred? Provide the date(s) or approximate timeframe.
B. Admit that Mr. Hiser has no opinion on whether it was prudent for Xcel not to have inspected the DC control cables for degradation prior to the date of the Event. If your answer is anything other than an unqualified admission, provide all information, analysis, or documents supporting your answer.
C. Admit that Mr. Hiser has no opinion on whether, absent the Event, it would have been prudent for Xcel not to have inspected the DC control cables, either as part of the SLR process or otherwise, prior to their failure from degradation. If your answer is anything other than an unqualified admission, provide all information, analysis, or documents supporting your answer.

Any responsive documents must be provided in their unlocked native format with all formulas and links intact.

Response:
A. Xcel Energy objects to this information request as calling for speculation in asking "absent the Event occurring," and assuming inclusion of the DC control cables in the commodity group sample selected for SLR testing, when testing of the control cables would likely have occurred. Subject to and without waiving this objection, the Company responds as follows:

The timeframe for the initial testing or examination of the DC control cables would be dictated by the SLR aging management program (AMP) approved for PINGP. The GALL-SLR AMP XI.E3B[1], states: "Required testing and the initial visual inspection for SLR are to be completed prior to the subsequent period of extended operation." With a license expiration date of August 9, 2033, for PINGP Unit 1, the initial testing and visual inspection would hypothetically have been expected to occur prior to August 9, 2033.

B. Xcel Energy objects to this information request as calling for a legal conclusion. Subject to and without waiving this objection, the Company responds as follows:

Witness Hiser stated in Docket No. E002/AA-22-179 OAH Docket No. 21-2500-20336 Exhibit ___(ALH-1), Schedule 2 on pages 8 and 9:

The renewed license for PINGP to permit plant operation from 40-60 years used the GALL report relevant to license renewal (GALL Report Rev. 1 (NUREG-1801, Rev. 1)) as a basis. This report provides no guidance for aging management of inaccessible instrumentation and control cables during the license renewal operating period from 40 to 60 years. . . . the direct buried DC control cables are not included in the scope of aging management for license renewal at PINGP. This is the current licensing basis for PINGP in the license renewal period.

Xcel Energy also incorporates by reference its response to DOC-IR 40.

C. Xcel Energy objects to this information request as calling for a legal conclusion and as calling for speculation in asking about inspection "absent the Event" and prior to either the SLR process or failure from degradation. Subject to and without waiving this objection, the Company responds as follows: See response to part B above.

Witness:	Allen L. Hiser, Jr., Ph.D.	**As to Objections:**
Preparer:	Allen L. Hiser, Jr., Ph.D.	Lauren Steinhaeuser
Title:	Senior Principal Regulatory Services Engineer	Assistant General Counsel
Department:	Enercon	Legal Services
Email:	ahiser@enercon.com	Lauren.Steinhaeuser@xcelenergy.com
Date:	June 13, 2025	

[1] Electrical Insulation for Inaccessible Instrument and Control Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements, Element 4 of the AMP, "Detection of Aging Effects."

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Xcel Energy		Information Request No.	5
Docket No.:	E002/AA-22-179		
Response To:	Minnesota Office of the Attorney General		
Requestor:	Judy Sigal		
Date Received:	June 2, 2025		

Question:
Reference: Expert report of Carl R. Bible at 5 and 6

Report states that "[t]he cables being replaced provide control to both unit's [sic] generator's breakers, various switchyard breakers and motor operated disconnects, and spurious operation of this equipment will cause a unit trip" and that "[i]ndustry operational experience is that control cables fail either due to damage caused during installation or long-term exposure to water."

A. Admit that the DC control cables are essential to the operation of the Prairie Island Nuclear Generating Plant. If your answer is anything other than an unqualified admission, provide all information, analysis, or documents supporting your answer.
B. Admit that Mr. Bible has no opinion on whether it was prudent for Xcel not to have inspected DC control cables for degradation prior to the date of the Event. If your answer is anything other than an unqualified admission, provide all information, analysis, or documents supporting your answer.
C. Admit that Mr. Bible has no opinion on whether, absent the Event, it would have been prudent for Xcel not to have inspected the DC control cables, either as part of the SLR process or otherwise, prior to their failure from degradation. If your answer is anything other than an unqualified admission, provide all information, analysis, or documents supporting your answer.

Any responsive documents must be provided in their unlocked native format with all formulas and links intact.

Response:
A. As witness Bible stated in Docket No. E002/AA-22-179 OAH Docket No. 21-2500-20336 Exhibit___(CRB-1), Schedule 2 on page 5, "the cables being replaced provide control to both unit's generator's breakers, various switchyard breakers and motor operated disconnects, and spurious operation of this equipment will

cause a unit trip." The DC control cables are therefore essential to the operation of the Prairie Island Nuclear Generating Plant.

B. Xcel Energy objects to this information request as calling for a legal conclusion. Subject to and without waiving this objection, the Company responds as follows:

Witness Bible stated in Docket No. E002/AA-22-179 OAH Docket No. 21-2500-20336 Exhibit___(CRB-1), Schedule 2 on page 3 and 4, "there are no industry requirements to inspect or test these cables. The only inspections or tests that would reasonably have been done on these cables would have been as a part of required sample testing for subsequent license renewal (SLR). Industry operational experience is that control cables fail either due to damage caused during installation or long-term exposure to water. From discussions with the PINGP cable program owner, there have been no observations of water accumulation in manholes or ponding of water in the vicinity of these cables. As such, the plant would have had no indications of a condition that would require action to determine and correct the accelerated aging degradation experienced by the control cables in question."

C. Xcel Energy objects to this information request as calling for a legal conclusion and as calling for speculation in asking about inspection "absent the Event" and prior to either the SLR process or failure from degradation. Subject to and without waiving this objection, the Company responds as follows: see response to OAG 5 (b).

Witness:	Carl R. Bible	**As to Objections:**
Preparer:	Carl R. Bible	Lauren Steinhaeuser
Title:	Senior Electrical Consultant	Assistant General Counsel
Department:	Enercon	Legal Services
Telephone:	cbible@enercon.com	Lauren.Steinhaeuser@xcelenergy.com
Date:	June 13, 2025	

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Xcel Energy		Information Request No.	49
Docket No.:	E002/AA-22-179		
Response To:	Minnesota Department of Commerce		
Requestor:	Andrew Golden		
Date Received:	June 6, 2025		

Question:
Topic: Outage Time and Replacement Power Cost Estimation during Subsequent License Renewal
Reference(s): Detmer Direct at 18; Exhibit___(NJD-1), Schedule 2 at 2-4

Witness Detmer at page 18 and Exhibit___(NJD-1), Schedule 2 at page 2 of his Testimony estimates the Company avoided a total of 93 days of outage time replacing the cables following the cable failure rather than as part of its 2029 subsequent license renewal (SLR) "using certain simplifying assumptions." Exhibit___(NJD-1), Schedule 2 at 4 also states the PLEXOS model estimated 87 avoided future outage days.

- Please confirm and support whether the Company's avoided replacement power costs were calculated using the 93 or 87 avoided future outage days.
- Please provide additional detail of the quantification of estimated future outage days avoided, such as a timeline of potential cable replacement in 2029 compared to actual cable replacement duration, to better understand the calculation of the estimate and how the assumptions informed it.
- Please provide all inputs and assumptions used in this calculation, as well as any relevant spreadsheets with formulas included, and explain for each one, why they are reasonable.
- Please provide support for the jurisdictional allocator used and why it is reasonable in determining $26.5 million total company amount compared to the $20.5 million Minnesota jurisdictional amount.

Response:
A) The Company's avoided outage days for Case 1 is 93 days. The "87 avoided future outage days" and associated Unit 1 and Unit 2 outage days referenced for Case 1 in the above-referenced schedule was inadvertently incorrect, resulting in an incorrect calculation of the replacement power costs. The Company will submit errata testimony correcting this error.

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B & C) Please see Attachment B to this response. The first tab titled "Flow Chart" was originally developed to help depict the avoided future outage days for a planned cable replacement outage. The flow chart and ultimate avoided outage days calculation relies on best case scenarios. This means it relies on typical refueling outage activity durations for shutdown, defueling, refueling, and startup and assumes no equipment or other issues. As shown by the purple cells in the "Flow Chart" tab, a 27-day refueling outage was assumed as the basis for the planned outage, and the refueling days were not included in the avoided outage days estimate. The second tab, "Calc & Assumptions," provides a comparison of the actual duration of the 2023 outage compared to the estimated durations applied for this planned outage scenario, including the assumptions applied to support the reasonableness of the estimated durations.

D) Please see Attachment A to this response for the supporting documentation for the allocator used. As can be seen in Attachment A, the allocator is based on forecasted sales for the NSP system in 2029. Fuel clause costs have historically been allocated to each state using sales, so this allocator is consistent with that historical treatment.

Attachment A is marked "Not-Public" in its entirety as it comprises information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). The information contains confidential forecast data that derives an independent economic value from not being generally known or readily ascertainable by others who could obtain economic value or a financial advantage from its disclosure or use. The Company takes efforts to protect this information from public disclosure. Thus, Xcel Energy excises this information as protected data pursuant to Minn. Rule 7829.0500

1. **Nature of the Material**: Long-range Sales Forecast
2. **Authors**: John Goodenough, Xcel Energy
3. **Importance**: Contains not-public, proprietary information.
4. **Date the Information was Prepared**: January 31, 2025 for the allocator and July 14, 2024 for the Sales Forecast

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Witness:	Nicholas J. Detmer	
Preparer:	Amanda J. Jepson	Nick Paluck
Title:	Manager, Nuclear Regulatory Policy	Manager, Regulatory Analysis
Department:	Nuclear Policy Planning	NSPM Regulatory
Telephone:	(651) 212-1679	(612) 330-2905
Date:	June 18, 2025	

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Xcel Energy		Information Request No.	12
Docket No.:	E002/AA-22-179		
Response To:	Minnesota Office of the Attorney General		
Requestor:	Judy Sigal		
Date Received:	June 2, 2025		

Question:

Reference: Detmer Direct at 21: "The financial benefit of the superior performance of PINGP from 2018 through 2022 can be quantified by comparing PINGP overall performance during that time to the industry norm. Doing so shows that PINGP performance was well below the industry median offline hours in that period. In fact, PINGP generated 2,577 GWh above Company forecasted output during that time increment benefiting customers by over $50 million dollars over that time period. In extending the time horizon to include the outage, PINGP's offline hours exceeded industry median by 51 percent."

A. Provide the calculation of the 51 percent figure in live Excel format.
B. Provide the calculation of the alleged $50 million benefit in live Excel format.
C. Recalculate the $50 million benefit using the same period that was used to the calculate the 51 percent figure (i.e., including the outage). How much return on equity did ratepayers pay for PINGP over this period?
D. How did Xcel select the 2018–2022 period used to calculate the alleged $50 million benefit?
E. Why were earlier years excluded and how does inclusion of the earlier years of 2012, 2013, and 2015 impact the benefit calculation?
F. Admit that customers have fully paid for the alleged $50 million benefit. If your response is anything other than an unqualified admission, provide all information, analysis, or documents supporting your answer and identify any PINGP costs for which customers have not paid.
G. Admit that if the Event had not occurred, and there were no replacement-power costs to offset, customers would not owe Xcel money for the alleged $50 million benefit. If your response is anything other than an unqualified admission, provide all information, analysis, or documents supporting your answer.

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Response:

A. See Attachment A to this response, a spreadsheet regarding Prairie Island Historical Performance vs. Industry.

B. See Attachment B to this response, a spreadsheet outlining Prairie Island Overperformance from 2018-2022.

C. Xcel Energy objects to this Information Request on the grounds that it is vague, unduly burdensome and requests documents not in existence, and therefore the Company does not respond.

Regarding return on equity, the Company does not typically calculate a return on equity for individual assets. However, the assets in question generally earn the same return as all other regulated assets, as approved by the Commission.

D. The years were selected because they represented the last five years of performance prior to the Event, which is the same basis typically used as inputs into our fuel cost forecast. For example, the Company uses a five-year average to forecast outage rates for all baseload and intermediate generation resources.

E. Xcel Energy objects to this Information Request on the grounds that it is unduly burdensome and requests documents not in existence. Subject to and without waiving this objection, see Xcel Energy's response to subpart D, above.

F. Xcel Energy objects to this Information Request on the grounds that it misstates or misapprehends the testimony and is vague, overly broad, and unduly burdensome.

Subject to and without waiving this objection, the Company answers as follows: Denied. The Company's customers have not "paid for" the $50 million benefit. Rather, customers have paid the costs associated with operating the Prairie Island plant, including capital, operations, and maintenance. The Company's prudent operation of the plant resulted in the $50 million benefit for customers by displacing higher cost generation and market purchases, resulting in the benefit to customers in the form of lower system fuel costs.

G. Xcel Energy objects to this Information Request on the grounds that it misstates or misapprehends the testimony and is vague, overly broad, and unduly burdensome and on the ground that it is calling for speculation in asking "if the Event had not occurred, and there were no replacement-power

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costs to offset." The Company has not taken the position that customers owe the Company for the approximate $50 million benefit. Subject to and without waiving this objection, see Xcel Energy's response to subpart F, above.

Please note that portions of Attachment B are marked as "Not Public" as they contain information the Company considers to be "not-public data" pursuant to Minn. Stat. §13.02, Subd. 9. This is information the Company considers to be "Trade Secret" information pursuant to Minn. Stat. § 13.37, subd. 1(b), because it has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

Witness:	Nicholas J. Detmer
Preparer:	Nicholas J. Detmer
Title:	Director, Market Operations & Analytics
Department:	Market Operations
Telephone:	303-571-7030
Date:	June 13, 2025

As to Objections:

Preparer:	Lauren Steinhaeuser
Title:	Assistant General Counsel
Department:	Legal Services
Email:	Lauren.Steinhaeuser@xcelenergy.com