



October 27, 2025

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

**RE: Center for Energy and Environment's Reply Comments in the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of a Residential Time of Use Rate Design**

Docket No. E002/23-524

Dear Ms. Bergman,

Center for Energy and Environment ("CEE") respectfully submits these Reply Comments to the Minnesota Public Utilities Commission ("Commission") in response to Xcel Energy's Reply Comments, filed October 17, 2025.

CEE appreciates Xcel Energy's ongoing commitment to providing a streamlined electric space heating rate enrollment process for heat pump rebate customers. CEE continues to recommend that Xcel Energy allow customers to enroll in the electric space heating rate directly through the heat pump rebate application process, but is open to other measures that Xcel Energy may recommend to further simplify the customer experience.

In Reply Comments, Xcel Energy also states, "the Company is exploring options to offer customers a streamlined online self-service enrollment process to further reduce barriers and enhance accessibility."<sup>1</sup> CEE strongly supports this approach. Providing multiple enrollment pathways would improve accessibility for all eligible customers, not just heat pump rebate recipients. An online option would avoid the risk of call center staff not being fully aware of the space heating rate and may be more appealing for some customers.

Regardless of whether an online self-service option is made available, Xcel Energy should ensure the experience of enrolling in the rate over the phone is as clear and easy as possible for all

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<sup>1</sup> Xcel Reply Comments. October 17, 2025, Docket Number E002/M-23-524. Page 4.

eligible customers. In addition to proactively training call center staff as outlined in Xcel Energy's Compliance Filing, CEE recommends that Xcel Energy explore and implement some form of confirmation of enrollment when customers enroll in the rate over the phone, such as through an email or other notification through the customer's account. This will allow customers to confirm they have successfully enrolled in the rate without having to wait for their first bill of the heating season.

CEE appreciates Xcel Energy's openness to recommendations and continued collaboration with stakeholders to ensure the space heating rate is accessible for all eligible customers.

We appreciate the Commission's consideration of our comments. Please contact me at [myatsuhashi@mncee.org](mailto:myatsuhashi@mncee.org) with any questions.

Sincerely,

/s/ Mariko Yatsuhashi  
Regulatory Policy Advocate  
Center for Energy and Environment

## **AFFIDAVIT OF SERVICE**

**DOCKET NUMBER E002/M-23-524**

I, Mariko Yatsunami, hereby certify that on this 27th day of October 2025, I served *Center for Energy and Environment's Reply Comments in the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of a Residential Time of Use Rate Design* in Docket Number E002/M-23-524 on the following persons on the attached Service Lists by:

  X   placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

  X   electronic filing

  /s/ Mariko Yatsunami  

Mariko Yatsunami

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30	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	23-524Official
31	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	23-524Official
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