



CITIZENS UTILITY BOARD

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June 12, 2026

VIA E-FILING

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

Re:

In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota

**MPUC Docket No. E-002/GR-24-320
CAH Docket No. 28-2500-40515**

Dear Executive Secretary Bergman,

The Citizens Utility Board of Minnesota ("CUB") submits this letter of preferred Decision Options related to Northern States Power Company d/b/a Xcel Energy's (the "Company") Application for Authority to Increase Rates for Electric Service in the State of Minnesota. We greatly appreciate Staff's Briefing Papers on this nuanced and complicated issue. Many of our positions are accurately captured therein, but we offer the below list of preferred Decision Options for further clarification, as separated based on Briefing Paper Volumes.

Volume 1

CUB supports Decision Options 1003 A, B, and C; 1009; and 1023

Volume 2

CUB supports Decision Options 2020, including 2020 A, B, and C. CUB also supports Decision Options 2022 and 2023 regarding the Department's proposed capital structure.

Volume 5

CUB supports Decision Options 5032 and 5036.

In the alternative to 5032, CUB supports 5033.

In the alternative to 5036, CUB supports 5037.

If the Commission chooses not to eliminate late payment fees in their entirety, CUB supports Decision Option 5033 as an alternative to Decision Option 5032. As captured in Witness Levenson-Falk's testimony, this alternative would waive late payment fees for low-income customers and set such fees at 0.45 percent per month for the remainder of the residential



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rate class, consistent with the interest rate paid by the Company on residential past due balances.¹

Although CUB is not opposed to the objectives of the RAMP program, we recognize that our primary position to eliminate late payment fees would result in removing the program's currently proposed funding mechanism. If the Commission were instead to adopt CUB's alternative recommendation for Decision Option 5033, we are comfortable with Decision Options 5015 or 5016, which would allow RAMP to proceed at the lower budget amount associated with reduced late payment fees.

CUB is also supportive of the discussion led by Commissioner Partridge at the Commission's June 11, 2026 hearing on this matter. As reflected by the questions posed and statements made, it is our understanding that Commissioner Partridge will be filing for consideration a Decision Option that would capture the Energy CENTS Coalition's recommendation that "supplemental, equitable funding streams" be identified and pursued so that RAMP can effectively operate at the full proposed budget amount while still moving forward with the late payment fee reduction reflected in Decision Option 5033.² CUB plans to discuss potential alternative funding mechanisms with the Company and Energy CENTS Coalition prior to the June 18, 2026 hearing.

Sincerely,

/s/ Brandon Crawford

Brandon Crawford
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cc: Service List

¹ Ex. CUB-3 at 23 (Levenson-Falk Direct); Ex. CUB-8 at 20-22 (Levenson-Falk Surrebuttal).

² Ex. ECC-02 at 5 (Shardlow Surrebuttal).

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