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April 15, 2025

—Via Electronic Filing—

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

RE: REPLY COMMENTS  
AUTHORITY TO INCREASE RATES FOR ELECTRIC SERVICE  
IN THE STATE OF MINNESOTA  
AUTHORITY TO INCREASE RATES FOR NATURAL GAS RATES  
IN THE STATE OF MINNESOTA  
DOCKET NOS. E002/GR-21-630 AND G002/GR-23-413

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, provides the enclosed Reply Comments pursuant to the Minnesota Public Utilities Commission's March 6, 2025 Notice of Comment Period and in response to the procedural recommendations of the Department of Commerce, Office of the Attorney General, Xcel Large Industrials, and Citizens Utility Board Comments received on April 7, 2025 in the above-referenced dockets.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Amber Hedlund at [Amber.r.hedlund@xcelenergy.com](mailto:Amber.r.hedlund@xcelenergy.com) or contact me at [Ian.m.dobson@xcelenergy.com](mailto:Ian.m.dobson@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

IAN M. DOBSON  
LEAD ASSISTANT GENERAL COUNSEL

Enclosure  
cc: Service Lists

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Audrey C. Partridge	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF XCEL ENERGY TO INCREASE RATES FOR ELECTRIC SERVICE AND INCREASE NATURAL GAS RATES IN THE STATE OF MINNESOTA	DOCKET NOS. E002/GR-21-630 AND G002/GR-23-413  <b>REPLY COMMENTS</b>
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**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or Company), provides this Reply pursuant to the Minnesota Public Utilities Commission (Commission) March 6, 2025 Notice of Comment Period (Notice) and in response to the procedural recommendations of the Department of Commerce (DOC), Office of Attorney General (OAG), Xcel Large Industrials (XLI), and Citizens Utility Board (CUB) Comments received on April 7, 2025 in the above-referenced dockets. The Company responds to the other party comments by issue, as set forth in the Notice. As discussed below, the Company continues to recommend the Commission request Initial Comments in July and Reply Comments in August, addressing the Court of Appeals decision reversing and remanding the Commission decisions regarding Xcel Energy's prepaid pension asset and the recoverability of executive compensation.

**REPLY COMMENTS**

1. **Should the Commission reopen the record in Docket No. 21-630 on the issue of the Company's claimed prepaid pension asset remanded to the Commission by the Court of Appeals?**
- and**
2. **Should the Commission request that the Department of Commerce seek authority from the Commissioner of Management and Budget to incur costs for specialized technical professional**

**investigative services pursuant to Minn. Stat. § 216B.62, subd. 8?**

The DOC and XLI address the issue of Xcel Energy's prepaid pension asset, making diametrically opposed recommendations as to the appropriate next steps. Neither the DOC nor XLI recommendations provides the most appropriate path for the Commission.

DOC alleges that "the parties did not develop the underlying contested case record" regarding this issue and that due to "gaps" in the record, the Commission should reopen the record, authorize the DOC to seek technical assistance, and set an initial comment date more than six months from now for this 2021 rate case docket – two months after the DOC and other intervenors will have already filed testimony in the Company's 2024 rate case.

The parties to the 2021 electric rate case already litigated the issue of the prepaid pension asset and developed a substantial record regarding the asset and its appropriate ratemaking treatment, with the Company, DOC and XLI all providing testimony addressing this issue. The Court of Appeals reversed the Commission's denial of rate base treatment for this asset, consistent with its prior decision in the Minnesota Power rate case where the Court "reversed the Commission's decision to 'categorically and entirely' exclude the utility's prepaid pension asset from its rate base." Slip Op. at 18. The Court of Appeals quoted the *Minnesota Power* language holding that "a utility's mandatory contributions to pension plans are an expense of a capital nature to which the Commission must give due consideration in determining the utility's rate base under Minn. Stat. §216B.16, subd. 6." *Id.*, citing *Minnesota Power*, 12 N.W.2d 477 (Minn. Ct. App. 2024). The Court of Appeals remanded this matter to the Commission with a simple and straightforward directive, concluding that "the appropriate course of action is to reverse and remand this decision to the Commission for additional findings to determine whether any of [the Company's] prepaid pension asset should be included in rate base."

While the Commission can benefit from additional comments from the parties as to how to apply the Court of Appeals' direction, this need not be a lengthy process and certainly not the extended process recommended by DOC. Moreover, given this substantial record already developed by the parties and the narrow issue back before the Commission, the Company does not believe final Commission resolution of this matter requires the DOC to hire outside expertise. However, should the Commission determine that it would benefit from the DOC hiring outside expertise, the Company respectfully notes that the Commission has already authorized engaging such an expert in the Company's 2024 rate case. To the extent that expert is utilized for the 2021 rate case as well, the Company suggests that initial comments in this case be

scheduled prior to or concurrent with the filing of direct testimony in the 2024 rate case, currently scheduled for August 22, 2025, rather than delaying this matter even further, as recommended by the DOC.

In contrast to the DOC's protracted schedule, XLI recommends the Commission not reopen the record but simply "supplement its decision" and again deny inclusion of the prepaid pension asset in rate base. In doing so, XLI strays beyond the procedural matters noticed for comment by the Commission, and XLI recycles the substantive arguments it made earlier in this proceeding – arguments that were not upheld by the Court of Appeals. Short-circuiting the process and simply denying rate recovery for the prepaid pension asset, as recommended by XLI, will not assist the Commission in bringing this matter to a full and final conclusion. Instead, the Commission should establish a comment and reply process, as discussed above and in the Company's April 7, 2025 Initial Comments.

**3. What process should the Commission use to make its decision on prepaid pension? Parties should comment on the applicability of *Matter of Surveillance and Integrity Review*, 996 N.W.2d 178 (Minn. 2023).**

As the Company recommended in its Comments, the notice and comment process is the most straightforward and timely means of resolving the prepaid pension asset issue remanded to the Commission by the Court of Appeals. There is simply no need or justification for the Commission, in turn, to remand this matter back to the ALJ. While the other parties express differing views on the applicability of the *Surveillance* case to the current matter, no party recommends the Commission send this matter back to the Office of Administrative Hearings. The Company agrees, as such a process would only further delay a full and final resolution of this case, as noted by the DOC.

**4. Should any different process be used to determine the Company's claimed prepaid pension asset in the 2021 rate case vs. the 2023 rate case?**

No party argued for a different approach to be used in resolving the 2021 and 2023 rate cases and Xcel Energy agrees that the Commission can resolve these matters using a single comment and reply comment process.

**5. Should the Commission reopen the record in Docket No. 21-630 in order to make additional findings on the issue of executive compensation?**

The Company continues to recommend the same comment and reply comment process discussed above for resolving the executive compensation issue. The DOC agreed that such a process provides the best path to full and final resolution, albeit on a significantly more delayed timeline, as discussed above.

Similar to its arguments on the prepaid pension asset, XLI argues that the Commission should not reopen the record, but should simply affirm its original decision on executive compensation, despite the Court of Appeals reversal. For the reasons discussed above, Xcel Energy does not believe such a process is likely to lead to a full and final resolution of this matter. OAG and CUB go even further than XLI, and stray even farther from the procedural matters set forth by the Commission for comment, by recommending the Commission now deny the Company recovery of *any* executive compensation. The Commission should summarily reject these recommendations. As the Company discussed in its April 7, 2025 Comments in this matter, neither OAG, CUB, nor any other party recommended limiting recovery of these compensation expenses in any manner. Executive compensation, as with any employee compensation, is a reasonable and necessary cost of providing utility service. Thus, while the Commission may now take comment on the appropriate level of recovery of these costs, it has no evidentiary basis on which to flatly deny recovery of all executive compensation costs.

**6. What process should the Commission use to make its decision on executive compensation? Parties should comment on the applicability of Matter of *Surveillance and Integrity Review*, 996 N.W.2d 178 (Minn. 2023)**

See above.

**7. Are there any other issues to be addressed in these dockets?**

No party raised any other issue the Commission needs to address in these dockets.

**CONCLUSION**

The Company appreciates the opportunity to provide these Reply Comments. As discussed above, the Company recommends the Commission request Initial Comments in July and Reply Comments in August, addressing the Court of Appeals

decisions regarding the prepaid pension asset and the recoverability of executive compensation. As these dockets involve rate case test and plan years that have already elapsed, this process allows for a prompt and final resolution of these matters. If the Commission determines that it would benefit from the DOC engaging outside expertise on the prepaid pension asset issue, the Company continues to believe this timeline is appropriate and in no event should the initial comment deadline be set later than the August 22, 2025 deadline for direct testimony in the Company's current rate case.

Dated: April 15, 2025

Northern States Power Company

## CERTIFICATE OF SERVICE

I, Victor Barreiro, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

**DOCKET NOS.      E002/GR-21-630**  
**G002/GR-23-413**

Dated this 15<sup>th</sup> day of April 2025

/s/

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Victor Barreiro  
Regulatory Administrator

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28	Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.		8300 Norman Center Drive Suite 1000 Bloomington MN, 55437 United States	Electronic Service		No	23-413Official
29	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-413Official
30	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	23-413Official
31	Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc		414 Nicollet Mall 7th Floor Minneapolis MN, 55401 United States	Electronic Service		No	23-413Official
32	Stephen	Melchionne	stephen.melchionne@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street, Ste. 1400 St. Paul MN, 55101 United States	Electronic Service		No	23-413Official
33	Kimberly	Middendorf	kimberly.middendorf@state.mn.us		Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul MN, 55164-0620 United States	Electronic Service		No	23-413Official
34	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-413Official
35	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official
36	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		No	23-413Official
37	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300	Electronic Service		No	23-413Official



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						Minneapolis MN, 55402 United States				
38	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	23-413Official
39	Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Ln PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	23-413Official
40	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-413Official
41	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	23-413Official
42	Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official
43	Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.		225 South Sixth Street Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official
44	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	23-413Official
45	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-413Official
46	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-413Official
47	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	23-413Official
48	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	23-413Official
49	Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine		225 S 6th St Ste 3500 Capella Tower Minneapolis MN, 55402-	Electronic Service		No	23-413Official

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						4629 United States				
50	Suzanne	Todnem	suzanne.todnem@state.mn.us		Office of Administrative Hearings	600 Robert St N PO Box 64620 St. Paul MN, 55164 United States	Electronic Service		Yes	23- 413Official
51	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	23- 413Official
52	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	23- 413Official