



October 7, 2025

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

**VIA E-FILING**

**Re:**

**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/M-23-524**

Dear Executive Secretary Bergman,

The Office of the Attorney General, Residential Utilities Division (“OAG”) and the Citizens Utility Board of Minnesota (“CUB”) offer this letter in response to the Minnesota Public Utilities Commission’s (the “Commission”) Notice of Comment Period issued on September 5, 2025 in the above-referenced docket.<sup>1</sup>

OAG and CUB appreciate the opportunity to provide comments on Northern States Power Company, d/b/a Xcel Energy’s (“Xcel” or the “Company”) August 14 compliance filing.<sup>2</sup> Pursuant to the Commission’s May 15, 2025 Order approving a new opt-in time-of-use (“TOU”) rate offering,<sup>3</sup> Xcel was required to provide additional information on several topics, including its implementation plan and budget; marketing, education, and outreach; changes to tariff language; and proposed reporting requirements. OAG and CUB specifically focus our review and below comments on Xcel’s proposed reporting requirements.

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<sup>1</sup> *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/M-23-524, Notice of Comment Period (Sept. 5, 2025) (hereinafter “Notice of Comment Period”).

<sup>2</sup> *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/M-23-524, Xcel Energy’s Compliance Filing (Aug. 14, 2025) (hereinafter “Xcel August Compliance Filing”).

<sup>3</sup> *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/M-23-524, Order Approving Revised Opt-In Proposal and Setting Reporting Requirements (May 15, 2025) (hereinafter “Commission’s May Order”).

## Proposed Reporting Requirements

The Commission ordered Xcel to “co-create with a stakeholder group a set of annual reporting metrics” and “include the group’s agreed upon metrics in the 90-day Compliance Plan filing.”<sup>4</sup> Xcel held an initial stakeholder workshop on July 9, 2025 to discuss the Company’s proposed list of reporting requirements. OAG, CUB and several other stakeholders requested inclusion of a number of reporting metrics absent from the Company’s proposal, notably including bill impacts and reporting by customer segment. After robust discussion, parties determined a second stakeholder meeting was needed to allow Xcel time to evaluate the feasibility of certain proposed metrics. On August 6, 2025 Xcel held its second stakeholder workshop and shared the Company’s updated list of proposed reporting requirements.

OAG and CUB appreciate Xcel’s subsequent incorporation of several additional metrics we believe will be helpful in monitoring impacts of the TOU rate, such as the number of TOU customers disconnected from service. Xcel also agreed to further segmenting its metric reporting by including impacts to census block groups, space heating customers, and net metering customers.<sup>5</sup>

However, Xcel declined reporting on metrics the OAG and CUB have emphasized the importance of since the beginning of this docket, including: 1) net customer bill impacts; 2) a narrative explanation of how reported peak reductions will factor into future resource and distribution planning; and 3) actual hourly load net of renewables. All three additional metrics would provide valuable information for the Commission and stakeholders, but OAG and CUB are particularly concerned with the absence of any analysis of customer bill impacts.

Xcel stated it is unable to perform an internal analysis of customer bill impacts based on its current billing system capabilities, and that to do so would require either 1) development of a shadow billing tool, or 2) retaining a third-party consulting firm to conduct the analysis externally. Xcel estimates a shadow billing tool would cost approximately \$2 million and take around two years to develop.<sup>6</sup> The Company similarly cited cost as the primary barrier to a third-party analysis. Xcel did not further explain why it could not calculate bill impacts for customers on the TOU rate despite it possessing in-house both their smart meter data and billing data.

OAG and CUB agree that the cost of reporting on this metric is an important factor to consider before requiring such reporting. However, it is also important to consider the cost of the rate itself to the customers who adopt it. The TOU rate assessed in Xcel’s pilot was an entirely different rate; without ongoing reporting on bill impacts, the Commission cannot assess the effect of the rate on ratepayers, some of whom may switch to the rate trusting that Commission approval of the rate means Commission oversight of the rate’s effects. This is even more important for low-income ratepayers who may switch hoping to save money—a

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<sup>4</sup> Commission’s May Order at 9, Order Point 17.

<sup>5</sup> OAG and CUB also requested customer segmentation analysis of seniors and renters, but those segments have not been included in Xcel’s proposal.

<sup>6</sup> *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/M-23-524, Xcel Reply Comments at 8 (Nov. 14, 2025).

significant marketing point of the Company's planned outreach material.<sup>7</sup> While reporting on disconnections tells the Commission whether the TOU rate has a catastrophic effect on these customers, bill impact reporting is necessary for a more nuanced understanding of whether the TOU rate increases or decreases energy burden for the rest of the segment. Although the TOU rate has been approved on an opt-in basis, Xcel does not plan to offer any bill protection mechanism.<sup>8</sup> While most customers will not be automatically defaulted onto the rate without prior knowledge,<sup>9</sup> customers may still experience a significant learning curve in understanding how to adjust and optimize their energy use. As consumer advocates, OAG and CUB are concerned at the prospect of implementing a new rate—entirely different in structure and pricing from the previously piloted TOU rate—without any method of tracking its impact on customers' bills. Customers are also more likely to adopt the rate if bill impact data shows they have a real opportunity to save by shifting their usage.

This concern is further exacerbated by the lack of clarity around the Company's proposed "Rate Comparison Tool." As explained by Xcel, this offering is intended to provide "a projection of potential cost based on [customers'] usage, on different rate options . . . serving the spirit of bill impact analysis."<sup>10</sup> Based on this vague description, it appears the tool will only provide loose projections of potential rate impacts, rather than detailing how customers are *actually* performing on their current rate and could *actually* perform on the TOU rate, which is what the OAG and CUB understood the tool to be from Xcel's prior representations. If the tool instead requires customers to "conduct a rate analysis themselves" or else contact Xcel for assistance,<sup>11</sup> it seems doubtful that the tool will even see much use. If both customers and stakeholders are unable to clearly review the bill impacts of the new TOU rate, OAG and CUB are concerned that customers may be negatively impacted and/or the new rate will be underutilized and unsuccessful.

Recognizing the investment needed to implement this rate,<sup>12</sup> OAG and CUB remain committed to ensuring Xcel's new TOU rate is set up for success. Customer bill impacts, whether positive or negative, will likely play a critical role in determining whether the new rate is successful. Without having any understanding of how customers on the rate are impacted, it will be incredibly difficult to measure rate success or understand a key reason customers may be opting out.

We appreciate Xcel's willingness to work with stakeholders in revising a list of reporting requirements and believe that collecting such data will be critical as parties review the impact TOU has on the utility and its customers. So that we and the Commission can better assess

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<sup>7</sup> Xcel August Compliance Filing, Attachment C at 2.

<sup>8</sup> *Id.* at 11.

<sup>9</sup> We note that customers who currently remain on the piloted TOU rate will automatically be transitioned to the new rate once launched. *Id.* at 4.

<sup>10</sup> Xcel August 6 Stakeholder Workshop Presentation at 9.

<sup>11</sup> *Id.* at 12.

<sup>12</sup> Xcel currently estimates \$9.7 million in costs for implementation and marketing, education and outreach through 2030. *Id.* at 25.

the full range of the cost-benefit considerations, we request the Company provide additional discussion in reply regarding the following:

1. An explanation of why Xcel is unable to conduct an annual bill impact analysis.
2. The estimated cost of hiring a third-party to conduct the bill impact analysis.
3. A description of how the Rate Comparison Tool will work, including whether customers will need to enter information or whether the tool will automatically display estimated bills based on data from the customer's AML meter.

OAG and CUB intend to provide final recommendations in reply, after review of Xcel's responses to the above.

Sincerely,

October 7, 2025

/s/ Olivia Carroll  
Regulatory Advocate  
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**STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION**

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/M-23-524

**CERTIFICATE OF SERVICE**

I, Olivia Carroll, 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. Joint Letter of the Minnesota Office of the Attorney General, Residential Utilities Division and Citizens Utility Board of Minnesota

Dated this 7th day of October, 2025.

/s/ Olivia Carroll

Olivia Carroll

Regulatory Advocate

Citizens Utility Board of Minnesota

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