



414 Nicollet Mall
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June 12, 2025

—Via Electronic Filing—

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

RE: REPLY COMMENTS
RENEWABLE*CONNECT PILOT, FLEX AND, LONG TERM PROGRAMS
DOCKET NO. E002/M-25-184

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the May 29, 2025 Comments of the Department of Commerce, Division of Energy Resources in the above-referenced docket. We provide additional information about Renewable*Connect subscription levels and enrollment as requested by the Department.

A. Program Subscription Level and Enrollment

The Company continues to experience issues addressing customers on the waitlist. Internal service policy and billing system constraints resulted in enrollment delays for a number of large and residential customers. To better accommodate waitlisted customers, the Company worked to build an online enrollment system that could handle a large volume of customers and process them more quickly. The online enrollment system build-out has experienced delays, and we are working with the vendor to resolve issues and resume enrolling customers. The Company continues to contact and enroll waitlisted customers manually, though this process is slower than an automated process. Progress has been made toward the Company's goal to reduce the waitlist by mid-2025. We now anticipate clearing the waitlist in 2026.

The Department requested we provide an update of the subscription level of the program and the specific number of customers on the waitlist. At the time of filing our Annual Report, the Renewable*Connect Long Term Program had a waitlist

exceeding 1,000 customers due to a number of unforeseen circumstances surrounding enrollment when the program launched. As of May 30, 2025, the number of customers on the waitlist for the program has been reduced to 874. The program currently has 90,907 MWh of unsubscribed energy compared to 91,500 MWh at the time of our Annual Report filing.

Table 1
Program Subscription Levels

Program Level	Total Program Capacity in MWh	2024 Program Sales in MWh	Percent Subscribed
Standard	255,267	90,536	35%
High Off Peak	459,296	203,949	44%
Total	714,563	294,485	41%

A large number of customers on the waitlist are residential, rather than larger industrial customers, meaning more individual subscribers will be enrolled.

The Department also requested an update on the status of the online enrollment system, and the resolution of the internal service policy and billing system constraints impacting program enrollment. The Company continues to experience issues with the billing and enrollment process. The enrollment process today includes emailing customers, receiving their subscription information, waiting for Renewable*Connect Flex program cancellation completion (if applicable), executing a customer contract, and re-enrolling. Currently, the process takes 1-2 billing cycles to complete.

We are working to resolve the delay in launching the automated enrollment tool, and the Company plans to dedicate additional resources to resolve the ongoing issues. We will update the Commission with any material improvements.

B. Revised Tariff Sheets and Neutrality Charge

On February 27, 2017 the Commission issued its ORDER APPROVING PILOT PROGRAMS AND REQUIRING FILINGS in Docket No. E002/M-15-985, and later issued its February 21, 2018 Order approving tariff revisions with modifications. The Company's March 2, 2018 compliance filing initiated the appearance of the program rate (and Neutrality Charge) on the tariff. The Company has consistently followed the same process annually, removing the previous completed year and adding the future year on the tariff.

In our Annual Report, we requested Commission approval of our revised tariff sheet

reflecting the 2026 Neutrality Charge in the Pilot Program and updating the Flex rate. We referred to Attachment D for our proposed 2026 Renewable*Connect Flex Program rate and Neutrality Charge.

We requested approval of Tariff Sheet No. 5-150 updating the 5-Year and 10-Year Neutrality Charges as approved by the Commission and originally presented in Attachment A to the September 21, 2017 revision to the Renewable*Connect Pilot Program in Docket No. E002/M-15-985.

In Information Requests issued by the Department concurrently with filed Comments, the Department requested additional information to confirm the calculation of the neutrality rate and encouraged the Company to provide the same information in its Reply Comments for the record. We provided responses and supporting calculations in DOC IR Nos. 1 and 2 submitted on June 9, 2025. We appreciate the Department's recommendation in their June 12, 2025 Reply Comments to approve the 2025 Program rates, neutrality charges, and our proposed tariff updates.

CONCLUSION

We respectfully request the Commission approve our revised tariff sheets as proposed and accept our Annual Report as supplemented by these Reply Comments.

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. If you have any questions regarding this filing, please contact Nathan Kostiuk at Nathan.c.kostiuk@xcelenergy.com or me at Rebecca.d.eilers@xcelenergy.com.

Sincerely,

/s/

REBECCA EILERS
MANAGER, REGULATORY AFFAIRS

c: Service List

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 No. E002/M-25-184

Dated this 12th day of June 2025

/s/

Victor Barreiro
Regulatory Administrator

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