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April 12, 2024

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

Re: *In the Matter of Xcel Energy's 2023 Integrated Distribution Plan*
Docket No. E-002/M-23-452

Dear Mr. Seuffert:

On March 28, 2024, the Commission considered Xcel Energy's transportation electrification plan (TEP) under Minn. Stat. § 216B.1615. The Commission voted to deny Xcel's proposal to waive certain tariffed cost-sharing requirements known as contributions in aid of construction (CIAC). The Commissioners' discussion, however, indicated that the Commission may revisit Xcel's CIAC-waiver proposal at a future agenda meeting on the utility's integrated distribution plan (IDP).

The Office of the Attorney General, Residential Utilities Division (OAG) reiterates its objections to Xcel's CIAC-waiver proposal as outlined in its December 20 initial comments and January 24 reply comments on Xcel's TEP.

Categorically exempting EV load from CIAC would create an unreasonable rate preference contrary to Minn. Stat. §§ 216B.03 and .07. The purpose of CIAC is to ensure that customers who cause system upgrades do not unfairly burden other ratepayers. And while EV-charging load can benefit the system through increased sales revenues, so can any new load. The CIAC tariff already accounts for this benefit by requiring Xcel to analyze the incremental revenue from new load and give the load-adding customer a credit that reduces the customer's CIAC obligation.¹ Xcel has not provided a reasonable justification for wholly exempting EV owners from these cost-sharing requirements that apply to all other customers.

¹ See Xcel Minnesota Electric Rate Book, Section No. 6, sheet 26.

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The OAG continues to recommend that the Commission deny Xcel's CIAC-waiver tariff proposal and order Xcel to cease its informal waiver practice. In the alternative, the Commission should require Xcel to track the revenues foregone as a result of the waiver so that the impact can be determined and allocated to the appropriate rate classes.

Sincerely,

/s/ **Peter G. Scholtz**

PETER G. SCHOLTZ

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CERTIFICATE OF SERVICE

Re: *In the Matter of Xcel Energy's 2023 Integrated Distribution Plan*
MPUC Docket No. E-002/M-23-452

I, JUDY SIGAL, hereby certify that on the 12th day of April, 2024, I e-filed with eDockets *a Letter of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
JUDY SIGAL

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