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Xcel Energy Information Request No. 3  
Docket No.: E002/M-23-524  
Response To: Minnesota Public Utilities Commission  
Requestor: Tera Dornfeld  
Date Received: November 14, 2025

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Question:

Please state whether residential customers with Battery Electric Storage Systems (BESS) interconnected to Xcel's system are eligible to use any of Xcel's proposed cogeneration rates for time of use customers codes A57 – A60.

If residential customers are not eligible, please explain how customers with BESS will be treated under TOU and NEM rates.

Additionally, please answer yes or no, "Is Xcel aware of behind the meter batteries with net energy exports on its system?" If so, please provide the number and total nameplate kW of these systems and additional detail as necessary.

Response:

The Company's cogeneration rates, including the new TOU rates (Rate Codes A57 through A60) are only available to customers who operate qualified facilities. In situations where customers have on-site BESS, whether the installation is considered a qualified facility is determined by what is used to power the BESS. If the system is only powered by solar panels or a wind turbine, then the installation may be considered a qualified facility and the exports from the BESS could be considered under our cogeneration tariff options. If the BESS is powered in whole or in part by system-generated energy, then the BESS would not be eligible for our cogeneration rates.

Customers with BESS are eligible to enroll in our new TOU rate, regardless of whether their BESS is considered a qualified facility or not. However, only qualified facilities will be eligible for compensation, via our cogeneration tariffs, for exports to the grid.

The Company is currently aware of 43 battery applications on our system that have turned on the ability to export energy to the system. Based on information provided to the Company, the total nameplate kW capacity of these systems is about 360 kW. Please note that the nameplate information for many of the installations was provided

to the Company by the contractors who completed the installations for customers, and the Company has not independently verified those values.

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