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April 7, 2025

—Via Electronic Filing—

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

RE: 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, submits the enclosed Comments per the Commission's March 6, 2025, NOTICE OF COMMENT PERIOD.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists. Please contact Amber Hedlund at amber.r.hedlund@xcelenergy.com, or me at 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 COMMENTS
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INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or Company), submits these Comments in response to the Minnesota Public Utilities Commission (Commission) March 6, 2025 Notice of Comment Period in the above-referenced dockets. The Notice follows the January 21, 2025 Court of Appeals decision reversing and remanding the Commission's decision on the issue the appropriate ratemaking treatment of the Company's prepaid pension asset and reversing and remanding the Commission's decision to limit recovery of executive compensation for its ten highest-paid executives to \$1.5 million annually. On both issues, the Court of Appeals noted that the Commission may, at its discretion, reopen the record.

As discussed below, the Commission now has back before it two straightforward questions: to what extent have shareholders contributed to the prepaid pension asset such that rate base treatment is appropriate; and what is the appropriate amount for the Company to recover for employee compensation for its ten highest-paid executives. Resolving these questions does not require a lengthy or complicated process and certainly does not require referral back to the Office of Administrative Hearings (OAH) for proceedings before an Administrative Law Judge (ALJ). The electric utility multi-year rate case was initiated in 2021, with test and plan years that have already passed. The gas utility rate case was filed in 2023, with a test year that has also passed. To bring both matters to conclusion, the Company respectfully requests that the Commission establish a notice and comment process by which these matters can quickly and finally be resolved.

I. BACKGROUND AND OVERVIEW

As part of the Company's Minnesota Electric Rate Case filed October 25, 2021, Docket No. E002/GR-21-630, the Company requested rate base treatment of its prepaid pension asset, related FAS 106 retiree medical benefits, and FAS 112 Long-Term Disability (LTD) benefits. Additionally, the Company requested rate recovery of executive compensation for its top ten highest-paid officers and employees through a combination of base salary, pension and other benefits, annual incentive pay, and two out of three long-term incentive programs.

On March 31, 2023, the Administrative Law Judge (ALJ) issued her Findings of Fact, Conclusions of Law and Recommendation (ALJ Report) in the matter. The ALJ Report recommended the Commission not approve rate base treatment for the prepaid pension asset and accrued liabilities. However, recognizing the benefit the prepaid pension asset provides in the form of reduced pension expense, the ALJ recommended that the Commission require the Company to recalculate its qualified pension expense without applying the expected return to the prepayment portion of the pension trust. The ALJ Report did not make any recommendation to the Commission regarding limiting the recovery of compensation for its ten highest-paid executives as, aside from recommending limiting the annual incentive plan payments to 15 percent of base pay and disallowing two of the three requested long-term incentive programs, no party recommended limiting recovery of these compensation expenses.

The Commission, in its July 17, 2023 Order, disallowed rate base recovery of a prepaid pension asset, related FAS 106 retiree medical benefits, and FAS 112 LTD, and rejected the ALJ recommendation to recalculate pension expense. In addition, the Commission limited the Company's recovery of compensation for its ten highest paid executives to a total of \$1.5 million.

On June 14, 2024, the Company filed an appeal with the Minnesota Court of Appeals that included challenging the Commission's decision on both the prepaid pension asset and the limitation on recovery of executive compensation. The Court of Appeals filed its decision on January 21, 2025 reversing and remanding these two issues to the Commission. Regarding the prepaid pension asset, the Court of Appeals stated: "As in Minnesota Power, we conclude 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." Slip Op. at 21. Regarding executive compensation, the Court of Appeals found the Commission's decision to limit rate recoverability based on a comparison to the

Governor's salary was arbitrary and capricious and reversed that decision, while remanding the issue to the Commission to make further findings. Slip op. at 26-27.

During this same time period, on November 1, 2023, the Company filed with the Commission a request to increase Gas Service on Minnesota gas customers in Docket No. G002/GR-23-413. On June 26, 2024, all parties to that case submitted a Settlement that the Commission subsequently approved. The Settlement included a provision that, should the pending appeal in the 2021 Electric Rate Case "result in a reversal or modification of the Commission's 2021 electric rate case order with regard to the prepaid pension asset, the Company shall be permitted to include the prepaid pension asset, net of ADIT, in the final revenue requirement and recover the net amount through rates accordingly." Settlement at 6. A similar provision applies to FAS 106 retiree medical benefits and FAS 112 LTD benefits for the 2024 test year rate base. The Settlement also included a provision for executive compensation that was not limited based on the outcome of the appeal.

II. RESPONSE TO NOTICE

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?

The parties heavily litigated the issue of the prepaid pension asset in this case, and it does not require re-litigation. Rather, Xcel Energy recommends the Commission request interested parties to file Initial Comments on this issue, in light of the Court of Appeals decision, in July and Reply Comments 30 days later. Such a timetable would allow the Commission to hear this matter in early fall and any rate changes resulting from the Commission's decision could be implemented effective January 1, 2026.

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 Company generally supports the acquisition of expertise by the Department of Commerce to assist the Commission in resolving highly technical issues. However, given the narrow issue before the Commission on remand and the fact that the Parties have already litigated this issue, the Company does not believe additional "specialized technical professional investigative services" are necessary to assist the Commission in reaching a just and reasonable result in these matters.

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)

The Company recommends the notice and comment process set forth above as the most straightforward and timely means of resolving this issue. The Minnesota Supreme Court decision in *In the Matter of the Surveillance and Integrity Review (SIRS) Appeals*, 996 N.W.2d 178 (Minn. 2023) (*Surveillance*) addressed a matter with a different procedural posture than this case, but still can provide guidance to the Commission on the appropriate next steps here. In *Surveillance*, the question before the Court was whether the Department of Human Services (DHS) appropriately remanded a case to an ALJ before making a decision, rather than affirming, modifying or rejecting the ALJ's Findings of Fact, Conclusions of Law, and Recommendation (Surveillance ALJ Report). The Court concluded that, under the Minnesota Administrative Procedure Act (MAPA), Minn. Stat. §14.62, DHS did not have the authority to remand the case to the ALJ. Therefore, since DHS had not affirmed, modified or rejected the *Surveillance* ALJ Report within the timeline required by MAPA, the *Surveillance* ALJ Report constituted the binding decision in that matter.

In this matter, the Commission issued its order modifying the ALJ recommendation. The Company challenged that decision on appeal and the Court of Appeals reversed and remanded, noting that the Commission may, at its discretion, reopen the record. However, while the Commission may now take additional comments, there is no need or justification for the Commission, in turn, to remand this matter back to the ALJ. Indeed, the *Surveillance* case suggests the Commission may not have the authority to send this matter back to the ALJ – a process that, if even permissible, would extend this matter for many more additional months.

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?

The 2023 natural gas rate case can be resolved using the same notice and comment process discussed above.

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 recommends the same notice and comment process for resolving the executive compensation issue.

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?**

The Company is aware of no other issues that need to be addressed in these dockets.

CONCLUSION

The Company appreciates the opportunity to comment on these issues. 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.

Dated: April 7, 2025

Northern States Power Company

CERTIFICATE OF SERVICE

I, Joshua DePauw, 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 7th day of April 2025

/s/

Joshua DePauw
Regulatory Administrator

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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