Direct Testimony and Schedules
Megan N. Scheller

Before the Minnesota Public Utilities Commission
State of Minnesota

In the Matter of the Application of Northern States Power Company
for Authority to Increase Rates for Natural Gas Service in Minnesota

Docket No. G002/GR-25-356
Exhibit___(MNS-1)

Technology Services

October 31, 2025

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Schedules

I. INTRODUCTION

Q. PLEASE STATE YOUR NAME AND OCCUPATION.

A. My name is Megan N. Scheller. I am currently serving as the Technology Services Sr. Director, Product Management, for Xcel Energy Services Inc. (XES), the service company affiliate of Northern States Power Company, a Minnesota corporation (NSPM or the Company) and an operating company of Xcel Energy Inc. (Xcel Energy). I have been in my current position since January 1, 2024.

Q. PLEASE SUMMARIZE YOUR QUALIFICATIONS AND EXPERIENCE.

A. As Sr. Director, IT Service Delivery, I lead the Business Operations team in Technology Services. My accountabilities in this role include improving and standardizing IT processes, such as IT strategy, financial management, and aligning enterprise IT plans with Company objectives. In my previous role, I was responsible for planning and executing the customer technology portfolio, with an emphasis on delivering technology to enhance our customer's digital experience. In this Direct Testimony, I represent the Xcel Energy Technology Services organization, which performs Xcel Energy's shared IT functions. A description of my qualifications, duties, and responsibilities is set forth in my Statement of Qualifications at the conclusion of my testimony. My résumé is attached as Exhibit___(MNS-1), Schedule 1.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

A. I present and support the Company's capital and operation and maintenance (O&M) budgets during the period of the 2026 test year for the Technology Services area.

Q. PLEASE PROVIDE AN OVERVIEW OF THE TECHNOLOGY SERVICES AREA WITHIN XCEL ENERGY.

A. Technology Services provides IT services across Xcel Energy. Like all utilities, Xcel Energy must invest in computers, software, networks, mobile devices, and other IT services each year in order to (among other things):

- Coordinate work in the field;
- Interact with customers;
- Run our gas system;
- Provide information to our state and federal regulators;
- Purchase gas;
- Bill and collect for services;
- Develop budgets and track expenditures;
- Manage vendors and vendor contracts; and
- Compensate employees.

Each of these activities is necessary to provide reliable natural gas service and a positive customer experience.

Q. CAN YOU PROVIDE AN OVERVIEW OF THE WORK TECHNOLOGY SERVICES WILL BE PERFORMING DURING THE 2026 TEST YEAR?

A. Yes. Technology Services will continue much of our fundamental IT work, including replacing aging technology, protecting customers and the Company against cyber security risks and attacks, strategically enhancing our IT capabilities to improve our customer and employee experiences.

This ongoing, fundamental IT work is necessary because technology changes constantly. With typical asset lives ranging from three to seven years (depending

on the system), the average lifespan of IT assets is considerably shorter than it is for assets in many other business areas. With these changes in technology and corresponding changes in the utility industry, we will continue to be flexible and nimble, working within the resources available to us, to address new technologies and needs as they emerge.

Q. PLEASE PROVIDE A SUMMARY OF YOUR TESTIMONY.

A. In my Direct Testimony, I describe the Technology Services organization, as well as some of the IT and business continuity services we provide. I illustrate that our in-servicing has resulted in a lower 2026 test year capital budget compared to 2025 and 2024 given the timing of multiyear investments being placed into service while our O&M investments have modestly increased in our business but have also varied year-to-year based upon the needs of the Company and our customers. I explain the kinds of investments we are currently making, why they are important to meet our customers' evolving energy needs, and how we work to ensure reasonable costs for those investments.

I present our proposed capital additions of approximately $7.9 million for 2026 on a NSPM (State of Minnesota Gas Jurisdiction) basis. I provide support for the key investments we seek to recover in base rates during the test year.

I begin by walking through the major capital projects that comprise these rate case budgets, organizing projects according to the following budget groupings: (1) aging technology, (2) cyber security, (3) enhancing capabilities, and (4) emergent demand.

I then discuss the Technology Services O&M budget for 2026, which has remained relatively flat in prior years since 2022 and is increasing in 2026. I explain why our O&M budget is reasonable and reflects the types of expenditures we must make to keep the technology side of our business running productively. I explain the kinds of investments we are currently making, why they are important to meet our customers' changing energy needs, and how we work to ensure reasonable costs for those investments.

Q. HOW HAVE YOU ORGANIZED YOUR TESTIMONY?

A. My testimony is organized into the following sections:

- *Section II* – Technology Services Overview
- *Section III* – Capital Investments
- *Section IV* – O&M Budget
- *Section V* – Conclusion

II. TECHNOLOGY SERVICES OVERVIEW

Q. PLEASE DESCRIBE TECHNOLOGY SERVICES' KEY ROLES AND RESPONSIBILITIES.

A. Technology Services is the Company's centralized IT organization, providing technology services across all operating companies, including NSP-Minnesota. These services include support for the following business operations:

- *Foundational Technology Infrastructure.* Technology Services is responsible for providing support for each employee's hardware and software needs. This includes maintaining and updating the hardware and operating systems used on company computers and servers, providing network connectivity, and providing sufficient data storage capabilities. Technology Services is also charged with protecting the security of the

Company's data from cyber attacks.

- *Systems Controls*. Technology Services provides technology support to our natural gas distribution units to help manage and operate the gas systems. This includes providing and supporting software applications such as Supervisory Control and Data Acquisition (SCADA), which is used to monitor the health of the natural gas distribution systems.
- *Customer Support*. We provide support for infrastructure and software that facilitate interactions with our customers. This includes maintaining the Customer Resource System (CRS), which is the Company's customer information system of record, which generates approximately four million billing statements to Xcel Energy customers on a monthly basis. We also support the Interactive Voice Response (IVR) software that enables interaction with customers via telephone keypad or speech recognition. Technology Services is also responsible for maintaining the technology used for the Company's website and other customer relationship management technologies that provide valuable information to customers about their accounts and Company operations, including outages.
- *Corporate Support*. We provide IT support for necessary corporate functions of the Company such as Human Resources and Financial Management. This includes providing and maintaining software applications that assist in the creation, tracking, reporting, and analysis of budget and forecast information.

Q. HOW DOES TECHNOLOGY SERVICES SUPPORT THE SERVICES OR FUNCTIONS DESCRIBED ABOVE?

A. Along with our day-to-day work to support the IT we have deployed, Technology Services makes capital investments and incurs O&M costs to support other business areas and functions across Xcel Energy as discussed above. I will discuss our capital investments and O&M trends in more detail below.

Q. WHY IS TECHNOLOGY SERVICES IMPORTANT TO THE COMPANY AND ITS CUSTOMERS?

A. Technology Services provides the technologies and supporting services necessary for system reliability and security, operational decision-making, and improved customer support and business capabilities. Technology is constantly advancing and evolving as a foundational aspect necessary to help any business meet its goals and objectives. In today's world, no large business can function in a safe and reliable manner, or provide appropriate customer service levels, without IT investments. For example, the IT and Operations Technology (OT) convergence, two traditionally separate systems, merges business insights, controls, and processes in a single uniform environment. This convergence allows utilities to reduce errors, improve efficiency, enhance workflows, and manage costs. There is an increasing reliance on data enabled by technology to make informed decisions on equipment status, demand load management, and other critical functions in the utility business. Actionable and accurate data are dependent on system integrations to ensure all relevant factors are considered from multiple information sources. IT is also a critical component of effective customer interactions and managing work and employees – whether from a human resource (HR) or field workflow perspective, and to enable day-to-day functions of the business, such as using laptops, field devices, conference rooms, and other communications equipment.

To operate in an environment where technology is constantly evolving, we must be thoughtful and proactive by identifying and integrating technologies that will both advance our business and protect it from technological attacks. For example, the advancements in two-way communications, intelligent devices, and SCADA necessitate the integration of many systems to ensure effective use of information and enable operational capabilities of new technologies. Identifying new technologies and integrating them into our system supports gas operations, system optimization, a more effective workforce with better-enabled employees, and more informed stakeholders through closer connections with external parties. These developments increase the importance of technology, and in turn Technology Services, to the Company and each of our stakeholders.

III. CAPITAL INVESTMENTS

A. OVERVIEW

1. 2022-2024 Technology Services Capital Additions

Q. OVERALL, WHAT SYSTEM UPGRADES AND REPLACEMENTS DROVE THE COMPANY'S INVESTMENTS DURING THE 2022-2024 PERIOD?

A. We have continued to invest in routine maintenance as well as projects to address outstanding business needs, including cyber security, improving communication capabilities, and supporting a safer, more efficient workplace. During this period, we also enhanced our focus on customer experience as evolving customer expectations are requiring us to work continuously to improve and maximize the performance of the tools serving customers. Our aging network infrastructure was (and continues to be) a key driver of increased investment and requires attention on an ongoing basis. Network connectivity is

a critical operational foundation required for the Company to provide a safe and reliable product, which, stated simply, is the extensive process of connecting locations across our Company for transfer of voice and data. The process of refreshing network connectivity devices follows a risk management practice. Failure to replace aging network mechanisms would increase the risk of component level failures resulting in systemic outages across service venues.

Q. MORE PARTICULARLY, PLEASE DESCRIBE SOME OF THE MAJOR CAPITAL ADDITIONS IMPLEMENTED OVER THE 2022-2024 TIME FRAME.

A. Major investments during this period included projects to address aging technology, such as the Gas Plant SCADA Replacement, a multi-phase project that includes work completed in 2022-2024 and continues into 2025. Phase 1 involved the replacement of the outdated Citect Gas SCADA system at the Wescott, Sibley, and Maplewood Gas Plants with a modern, robust SCADA solution. Phase 2 work involves physical plant device modifications that will require control system upgrades at the three plants, implementation of a hardware and software backup and recovery solution, implementation of an operational solution for centralized communications and control of the gas plants, gas turbine and compressor upgrades that will require updates to the control system software, network, Programmable Logic Controllers, and the emergency safety shutdown system and dependent hardware. In addition, the Gas Frontline Enablement and Experience project replaced the legacy Work Manager with a mobile platform that streamlines inspection and survey workflows. Field crews gain real-time asset data, geolocation, and offline access, boosting safety and documentation accuracy. It supports preventative maintenance and simplifies data entry, improving compliance and crew productivity. Finally, the Company placed into service a major project in the

Core HR application project, which replaced multiple existing core human resources software systems and vendors, including workforce management, payroll, benefits administration, talent management, time keeping, and job record tracking to employees and retirees of the Company.

Q. PLEASE DESCRIBE THE COMPANY'S EFFORTS TO IMPROVE THE CUSTOMER EXPERIENCE DURING THE 2022-2024 PERIOD.

A. In the Company's prior rate case, Docket No. G002/GR-23-413, capital investments made to improve the customer experience were included in a separate "Customer" budget category, as reflected in Table 1 below. By way of background, while all of Technology Services' work puts the customer front and center, prior to 2019, it had been several years since we had invested significantly in primary customer touch points and relationship management tools. In support of the enterprise focus on enhancing customer experience, Xcel Energy launched a specific Customer Experience Transformation (CXT) program in 2019 to help create smarter and simpler experiences for employees and customers and created a new category called customer enhancements. Xcel Energy is now utilizing more modern technologies that customers have come to expect through experiences with other companies. This includes interactive websites, account management options, and smart phone applications. While the foundational CXT components have been implemented, the Company continues to invest in improving the customer experience. These additional investments are now reflected in other capital categories in the 2026 test year.

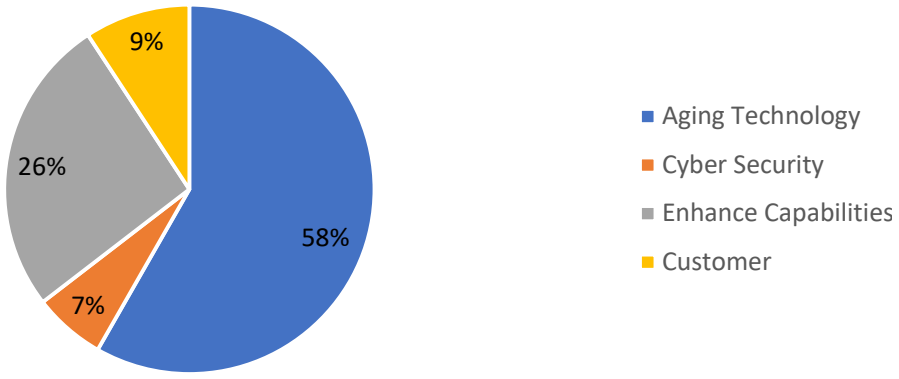
Q. WHAT WERE THE TECHNOLOGY SERVICES ACTUAL CAPITAL ADDITIONS FOR THE YEARS 2022-2024?

A. The 2022-2024 actual capital investments by category that the Company made are provided below in Table 1 and Figure 1.

Table 1
2022-2024 Actual Capital Additions
(State of Minnesota Gas Jurisdiction)
(Dollars in Millions)

Capital Category	2022	2023	2024
Aging Technology	$15.0	$11.5	$10.9
Cyber Security	1.4	.8	1.8
Enhance Capabilities	6.0	7.6	3.3
Customer	4.0	1.0	.9
Total	$26.5	$20.8	$17.0
*There may be differences between the sum of the individual category amounts and Total amounts due to rounding.			

Figure 1
2022-2024 NSPM Actual Capital Additions



Q. CAN YOU EXPLAIN WHY THE AMOUNTS OF INVESTMENT IN THESE CAPITAL BUDGET GROUPINGS VARIED OVER THESE THREE YEARS?

A. Yes. Our investments vary year-over-year depending on the needs of existing technology systems and timing of multiyear investments being placed into service.

In 2022, there were several larger project additions in aging technology and enhancing capabilities, including Gas Plant SCADA Replacement, Gas Frontline Enablement and Experience, and the VoIP Refresh. In addition, we also had significant investments to improve the customer experience in 2022.

In 2023, we continued to focus on refreshing our aging technologies, upgrading our cyber security capabilities, and enhancing the Company's capabilities, and began winding down the customer experience program.

In 2024, the level of capital additions decreased from past years, but the focus on addressing aging technology, enhancing capabilities and addressing cyber security remained, including continuation of the Gas Plant SCADA Replacement project, the Monitoring Device Management System (MDMS) Replacement, and software license renewals. The Company also completed Customer CXT investment projects, as discussed above. These projects implement additional channel enhancements, continued design enhancements, new features for customers with multiple billing accounts, easier auto-pay enrollments and reduced errors and exceptions.

Q. LOOKING AT THIS HISTORY, WHAT DO YOU CONCLUDE?

A. Technology Services' prior capital investments have supported the technologies needed to provide Natural Gas Service to our customers. Without ongoing investment in technologies, we would lack the tools to operate reliably and securely, support decision-making, enable communications and "smart"

resources, and protect such fundamentally important resources as our grid, our customer information, our generation management, and our financial data.

Q. MOVING FORWARD, CAN YOU BRIEFLY ADDRESS TECHNOLOGY SERVICES' CAPITAL WORK IN 2025 SO FAR?

A. Yes. We have continued to invest in routine replacements as well as projects to address outstanding business needs, such as our annual refresh work. The Company completed the Enterprise Service Bus (ESB) Modernization project, which upgrades Xcel Energy's aging integration system to a cloud-based platform that enables secure, real-time data sharing across key systems. It improves performance, scalability, and reliability while reducing maintenance and service disruption risks. The Company also continued to address cyber security needs by renewing licenses for technologies like Industrial Defender and Dragos—two cybersecurity platforms used to protect industrial control systems. Industrial Defender supports asset monitoring, configuration management, and compliance for operational technology environments, while Dragos provides advanced threat detection, network monitoring, and incident response.

2. Overview of the 2026 test year

Q. WHAT IS THE COMPANY'S CAPITAL ADDITION FORECAST FOR THE 2026 TEST YEAR BY CAPITAL BUDGET GROUPING?

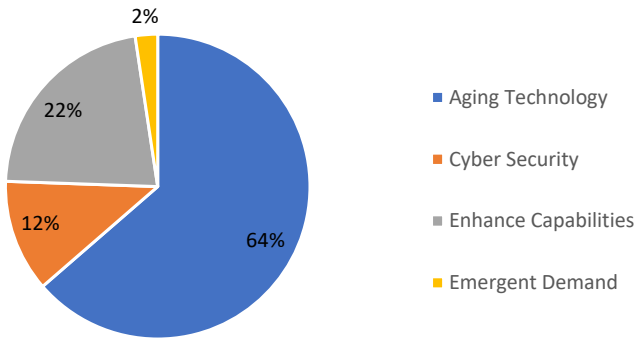
A. Our capital addition forecasts by budget grouping for 2026 is set forth in Table 2 and Figure 2 below. Individual project capital investment additions are also listed in Exhibit___(MNS-1), Schedule 2.[1]

[1] In some cases, rounding may result in a slight variation between some tables and Schedule 2.

Table 2
2026 Forecast Capital Additions
(State of Minnesota Gas Jurisdiction)
(Dollars in Millions)

Categories	2026
Aging Technology	$5.0
Cyber Security	0.9
Enhance Capabilities	1.8
Emergent Demand	0.2
Total	$7.9

Figure 2
2026 Capital Additions



Q. WHAT KEY PROJECT AREAS WILL THE COMPANY INVEST IN DURING THE 2026 TEST YEAR?

A. As illustrated by Table 2 and Figure 2 above, Technology Services is devoting significant resources to address aging technology, enhancing capabilities, and cyber security initiatives. We are also continuing to manage emerging needs.

Our aging network infrastructure continues to be a key driver of investment and requires attention on an ongoing basis, which, as I previously indicated, is a critical operational foundation required for the Company to provide safe and

reliable operations. An example of this kind of work is the Enterprise Gas SCADA Upgrade Project, which will be placed in service during the test year and supports modernization of our gas system monitoring capabilities.

In addition, we continue to seek out areas that will enhance the Company's capabilities to provide service to our customers. An example of this in 2025 is the Customer Care IVR Upgrades project, which not only enhances our customer interaction systems but also replaces aging IVR infrastructure that is critical to maintaining reliable and scalable service operations.

I will discuss these efforts in more detail later in my testimony.

Q. CAN YOU PROVIDE AN OVERALL PICTURE OF YOUR CAPITAL EXPENDITURES AND CAPITAL ADDITIONS TRENDS FROM 2022 THROUGH THE END OF THE TEST YEAR (2026)?

A. Yes. Our overall 2022 through 2026 capital additions and capital expenditures are set forth in Tables 3 and 4 below, respectively. I have broken these numbers out by general Technology Services (included in this case).

Table 3
2022-2026 Capital Additions
(State of Minnesota Gas Jurisdiction)
(Dollars in Millions)

	2022 Actual	2023 Actual	2024 Actual	2025 Forecast	2026 Test Year
Aging Technology	$15.0	$11.5	$10.9	$7.4	$5.0
Cyber Security	1.4	0.8	1.8	1.4	0.9
Enhance Capabilities	6.0	7.6	3.3	5.9	1.8
Customer	4.0	1.0	0.9	0.0	0.0
Emergent Demand	0.0	0.0	0.0	0.0	0.2
Total	**$26.5**	**$20.8**	**$17.0**	**$14.7**	**$7.9**

*There may be differences between the sum of the individual category amounts and Total amounts due to rounding.

Table 4
2022-2026 Capital Expenditures
(State of Minnesota Gas Jurisdiction)
(Dollars in Millions)

	2022 Actual	2023 Actual	2024 Actual	2025 Actual/2025 Forecast	2026 Forecast 2026 Test Year
Aging Technology	$10.7	$14.1	$8.4	$6.7	$10.0
Cyber Security	1.4	1.3	1.1	1.1	0.9
Enhance Capabilities	6.1	6.4	4.2	4.5	4.6
Customer	1.1	0.9	0.6	(0.0)	0.0
Emergent Demand	0.0	0.0	0.0	0.0	0.6
Total	**$19.3**	**$22.7**	**$14.3**	**$12.3**	**$16.1**

*There may be differences between the sum of the individual category amounts and Total amounts due to rounding.

Tables 3 and 4 illustrate that Company investments in IT vary depending on the specific work that is necessary for our business and our customers in a specific year. In the years when less investment is needed, we budget accordingly, and

Company resources are used where they may be required in other business areas. Conversely, Technology Services capital expenditure levels may increase in years when we are embarking on new or significant initiatives, and capital additions necessarily increase when those initiatives are placed in service.

Q. WHY DO CAPITAL ADDITIONS TOTALS DIFFER FROM CAPITAL EXPENDITURE TOTALS?

A. While the capital addition trend is directly affected by our capital expenditures, the capital additions (plant in service) trend may not mirror the capital expenditure (spend) trend and may fluctuate more depending on the length of time individual projects take to complete. The capital expenditure trend reflects the progress of the project through the months, whereas the capital addition trend reflects the total at the conclusion of the construction or implementation process when the asset is placed in service. For example, the Company is currently anticipating placing certain notable projects in service in 2027 and 2028, including the CRS replacement project in 2028, which is a solution to replace the Company's current Customer Information System (or CIS). Such efforts will necessitate higher capital expenditures (but not necessarily higher capital additions) for Aging Technology work in 2026. I address the specific capital additions driving Technology Services costs below.

Q. WHAT MAJOR CAPITAL PROJECTS DOES TECHNOLOGY SERVICES ANTICIPATE COMPLETING OVER THE PERIOD OF THE COMPANY'S 2026 TEST YEAR REQUEST?

A. As shown Table 5 below, we anticipate undertaking seven major capital projects in 2026. These capital additions include:

Table 5
2026 Major Capital Projects
(Dollars in Millions)

State of Minnesota Gas Jurisdiction	2026
Project	**Test Year**
Lifecycle Management (LFCM)	$1.6
Integrated Risk Assessment System (IRAS) Replacement	0.9
Blackline Dual Detection and Comm Devices	0.6
Private LTE	0.6
Underground Gas Storage	0.4
OT Asset Management - Enterprise Field Device Management Solution	0.3
Primavera (P6) Upgrade	0.3
Total	$4.7

B. Technology Services Investment Needs

Q. WHAT ISSUES ARE DRIVING TECHNOLOGY SERVICES' STRATEGIC CAPITAL PLANNING?

A. As I discussed above, the four key areas driving IT investment going forward are: (1) replacing aging technology; (2) addressing evolving cyber security threats and requirements; (3) enhancing capabilities; and (4) addressing emergent demands. I discuss each of these areas below and also explain how we are addressing emergent demands in the next section, Project Budgeting and Governance.

1. Aging Technology

Q. WHAT ARE THE PRIMARY ISSUES FACING THE COMPANY WITH REGARD TO AGING TECHNOLOGY?

A. Technology Services supports the operations of the Company with a large and growing IT infrastructure. Information assets are no different from physical

assets, although IT assets have generally shorter lives. They are subject to aging, technological obsolescence, and increasing maintenance costs. Technology Services not only completes routine annual refreshes of technology, like replacing computers and printers, but also plans and places in service large IT projects that modernize the Company's IT and address the needs and experiences of our customers and employees. A reasonably up-to-date infrastructure is necessary for the Company to continue to meet increasingly demanding data security, reliability, and compliance requirements, as well as the service expectations of our customers. For example, some aging technologies are not equipped with the most current data security measures, meaning they are more vulnerable to cyber-attack. In addition, the recovery of aging technologies after an outage can be compromised if those systems are no longer supported by their vendor.

While the primary objective of addressing aging technology is risk mitigation (ensuring safe, secure, and reliable systems to avoid business operations disruptions), there are occasions when replacing or upgrading aging IT can also enable the Company the opportunity to take advantage of certain enhancements or efficiencies of more modern IT, such as automating previously labor-intensive processes in order to manage the growth of labor costs and other employee expenses, such as travel time. Other upgrades make our systems more secure, make them more compatible with existing IT across the Company, or are implemented to maintain compliance with regulations, including the Federal Energy Regulatory Commission (FERC) Critical Infrastructure Protection (CIP), the Department of Homeland Security (DHS), and the Transportation Security Administration (TSA).

Another area of IT that must keep pace with current needs is the Company's data storage capabilities. The increasing use of technology across the organization results in the need to store, transmit, and manage ever larger amounts of data, and our systems must be able to keep up with these growing data storage needs. While solutions such as routine information purging and data warehousing can help reduce the impact of this significant data increase, they are not sufficient to fully mitigate it. As a result, we need to increase our storage capacities and the speed and flexibility of our networks and improve our tools to cost effectively manage our data and information.

Q. HOW DOES THE COMPANY DETERMINE WHEN EXISTING IT NEEDS TO BE REPLACED?

A. Technology Services strives to maximize our technology investments by maintaining existing software and hardware until the risk and costs associated with keeping these aging technologies in place require attention. For instance, new software systems are often necessary when the existing software is no longer supported by the vendor. In general, Technology Services seeks to maximize the use of existing systems prior to replacing them. This is the general practice of delaying certain aging technology upgrades or replacements as long as reasonably feasible in order prioritize more critical upgrades or replacements of other technologies. Regardless, there are times when we must upgrade our aging systems due to security, reliability, or compliance needs.

2. Cyber Security

Q. PLEASE SUMMARIZE THE CYBER SECURITY ISSUES FACING THE COMPANY.

A. There are four key cyber security issues the Company must address: (1) keeping hackers out of our systems; (2) detecting hackers if they attempt to gain access

to our systems; (3) removing hackers that gain access to our systems; and (4) returning our systems to their original state if hackers gain access. As the number of cyber threats, attacks, and regulatory requirements continue to increase in volume and complexity, it is imperative that the Company continue to maintain the proper tools to protect the integrity and confidentiality of our data and our systems. Given the unpredictability of these threats, it is important that these tools and resources continue to evolve in response to new threats to our information systems. Because cyber security threats are constantly in flux, it may result in additional investment in a given year to ensure that cyber security tools and resources are responsive to new threats to our information systems.

It is important to note that cyber security is not simply a matter of implementing a standardized base of security controls and processes that cover all the regulatory and legal requirements. Effective cyber security requires a holistic approach that includes effective regulatory and legal compliance processes, trained staff and updated technology. Many large financial companies that have had their data hacked in recent years were compliant with regulatory and legal requirements but lacked robust cyber security technology or updated systems.

Q. WHAT IS TECHNOLOGY SERVICES DOING TO ADDRESS EVER EVOLVING CYBER SECURITY THREATS?

A. The Company has taken great strides to address cyber security threats. For instance, the Company's dedicated Enterprise Security Services (ESS) business area carries out the Company's vision, mission, and goals by proactively leading efforts to identify, protect, detect, and respond to all-hazard threats and events. The ESS oversees all aspects of security, which includes: cyber, physical, and personnel; investigations and digital forensics; threat management; privacy

(customer and employee); enterprise emergency management; and while the CIP standards developed by the North American Electric Reliability Corporation (NERC) primarily apply to electric assets, the Company's enterprise-wide cybersecurity governance incorporates similar protections for gas-related systems where appropriate.

To meet the needs and demands of today's security requirements, Technology Services has also implemented multiple security systems and technologies. We have implemented technologies to date that include: Vulnerability Management; Advanced Threat Protection; Security Forensic tools' Advanced Firewalls' Intrusion Prevention Devices; and a Security Incident and Event Management system to correlate all the data and bring visibility to what is happening on our infrastructure.

Moreover, we have enhanced our partnerships with regulatory, state, and federal agencies to ensure we are tapped into the stream of information available regarding impending threats and attacks. These associations and agencies include Edison Electric Institute, National Infrastructure Advisory Council, American Gas Association, the Federal Bureau of Investigation, and the U.S. Department of Homeland Security.

In addition, our disaster recovery team works with application support teams to validate their disaster recovery plans on an annual basis. We have also implemented an isolated infrastructure and computing platform to enable thorough physical testing of recovery plans for certain critical applications, such as those running on the System Analysis Program (SAP) platform, to ensure full recoverability.

3. Enhancing Capabilities

Q. HOW DOES TECHNOLOGY SERVICES ASSIST IN ENHANCING CAPABILITIES FOR THE COMPANY?

A. Technology can offer the opportunity to improve productivity, enhance communications between systems and between people, and use data more effectively. As an example, mobile phones were not necessarily invented to solve a problem with land-based telephone lines or service. However, as they emerged and became increasingly sophisticated, they have changed our society. We needed to adapt and learn how to derive as much efficiency as possible from what have become wireless mobile computing devices. Technology Services must regularly evaluate new technologies to help the business areas increase efficiencies and enhance communications between systems that benefit the Company and our customers.

Q. HOW DOES TECHNOLOGY SERVICES DETERMINE WHICH CAPABILITY-ENHANCING TECHNOLOGIES TO IMPLEMENT?

A. The key is to identify and implement new technologies that provide new capabilities while balancing competing IT demand within budgets. The Company considers a variety of aspects, such as soft savings, cost avoids, number of hours saved, and hard savings when determining whether the benefits of a new technology are worth pursuing. Soft savings, cost avoids, and number of hours saved, however, do not always result in a tangible financial impact (hard savings). In addition, qualitative factors, such as customer and employee satisfaction, are also taken into consideration. Cost avoids, soft savings, and qualitative benefits, while they do not affect financial statements, provide a holistic view of the impacts that new technology can have on stakeholders. Technology Services works prudently with various business units

to evaluate new technologies to determine whether they can be used to improve efficiency in the way tasks are completed, data is used, or in the way communications are conducted within the organization and with external stakeholders, including our customers. For example, technology is being used in gas operations to replace the legacy Work Manager application with a mobile solution that enables field crews to complete inspection and compliance tasks more efficiently. The new platform provides real-time access to relevant data, supports geolocation and offline functionality, and integrates with backend systems to streamline documentation and improve data accuracy—all of which enhance worker safety, support regulatory compliance, and reduce delays in field operations.

Q. HOW DO YOU DIFFERENTIATE BETWEEN ENHANCE CAPABILITIES INVESTMENTS AND THE AGING TECHNOLOGY INVESTMENTS?

A. Due to the nature of certain IT investments, some investments overlap between categories. That said, the projects in the Aging Technology category typically involve the replacement of assets that were already in service, while the projects in the Enhance Capabilities category typically involve implementing systems that are new applications or application modules that add to business capability or efficiency. When applications are upgraded, business judgment is necessary to determine which categorization is most appropriate.

C. Project Budgeting and Governance

1. Methodology for Establishing a Reasonable Overall Budget

Q. HOW DOES THE TECHNOLOGY SERVICES AREA ESTABLISH A REASONABLE CAPITAL BUDGET FOR A GIVEN YEAR?

A. The appropriate annual capital budget for Technology Services is based on a partnership between corporate management of overall finances and the business needs we identify. Company witness Gregory J. Robinson explains how the Company establishes overall business area capital and O&M spending guidelines and budgets based on financing availability, specific needs of business areas, and overall needs of the Company.

The Technology Services area itself employs a "bottom-up" approach to planning for the needs our business area addresses. Technology Services will continue to use a portfolio prioritization and balancing process to determine the needs we must address and decide how to allocate limited funds according to the highest business priorities, including the greatest demands our IT systems face in each year. The portfolio is regularly prioritized and balanced to support established strategic objectives using predefined portfolio management criteria, the organization's desired risk profile, portfolio performance metrics, and capacity constraints. These projects are then rolled up to total budgeted costs by capital budget groupings. Often the desired initial budget exceeds the spending guidelines, which then requires review meetings with managers, directors, and vice presidents to assess the requested budget and determine the right course of action.

Because this happens throughout the Company, a higher or lower percentage of the Company's overall resources may be allocated to Technology Services in any given year, depending on the priority of needs throughout the Company. Ultimately, corporate leadership determines the amount of funding to be allocated to Technology Services for each year, as part of the total budget development for the Company.

Q. HOW DOES TECHNOLOGY SERVICES MANAGE ITS BUDGETED PROJECTS TO THE OVERALL CAPITAL BUDGET ALLOTTED TO IT?

A. Once the Technology Services funding allotment is known, Company leadership has final approval for either maintaining the portfolio "as is" or adjusting the portfolio within the established budget thresholds as part of a formal Technology Investment Governance (TIG) process. The purpose is to determine whether the projects included in the budget are sound, viable, and worthy of funding, support, and inclusion in the Company's IT portfolio. The process of adjusting the portfolio may include:

- adding new projects that have been selected and prioritized for inclusion in the budget;
- identifying projects that are not authorized based on the review process; or
- eliminating projects to be suspended, reprioritized, or deferred based on the review process.

Our overall budget supports our investments in technologies and supporting services as necessary to ensure system reliability and security, to facilitate operational decision-making, and to provide the necessary levels of support to our customer support and business capability functions. Technology Services is expected to manage its capital additions to its capital budget once that budget has been developed, fully vetted, and approved.

2. Changes in Planned Projects

Q. AS A PROJECT MOVES THROUGH DEVELOPMENT, DOES TECHNOLOGY SERVICES TAKE STEPS TO MONITOR VARIANCES BETWEEN ITS ACTUAL EXPENDITURES AND ITS BUDGET?

A. Yes. In each key area of Technology Services, management monitors actual versus budget expenditures for both capital and O&M on a monthly basis. Any deviations are then evaluated to determine whether costs are appropriate. In addition, action plans are developed to mitigate variances in actual to budgeted expenditures. These mitigation plans may either reduce or delay other expenditures to support the overall authorized budget. If authorized budget adjustments are required, they are identified and approved at an appropriate level of management.

Q. DOES TECHNOLOGY SERVICES ALSO ENCOUNTER TIMES WHEN IT MUST CHANGE PROJECT PLANS?

A. Yes. For some projects, the complex nature of the project implementation and long lead times mean we must plan for the project and carry it out over a longer period of time. In these situations, we may need to adjust project cost expectations, timelines, or scope as the details and design of the project become more certain over time.

Other projects may have shorter lead times, a lower priority, or other reasons why they are important but could be delayed if a higher priority or more urgent project emerges. However, we remain obligated to manage to our budget and use the TIG process to re-prioritize projects within a year to stay within our overall budget.

Q. IF PROJECT PLANS NEED TO CHANGE, DO CHANGES IN PROJECT METRICS PRIOR TO IN-SERVICE REQUIRE APPROVAL FROM THE TIG PROCESS?

A. Yes. Any change to the budget, schedule, or scope of a project must be approved by the TIG process to ensure that the change is necessary and well-documented and brought forward to TIG process leadership.

We must seek approvals in addition to the TIG process, including possibly Corporate Governance approval, if costs of larger projects exceed certain pre-approved levels.

Q. PLEASE EXPLAIN THE PROCESS TO ACCOMMODATE NECESSARY UNFORESEEN CAPITAL INVESTMENTS THAT OCCUR DURING THE PLANNED CAPITAL INVESTMENT YEAR.

A. Technology changes constantly. As a result, issues with older software or equipment may not seem urgent during budget creation but become more urgent if systems begin to show signs of issues or failure, or no longer serve their intended purpose as business needs evolve. We utilize the portfolio prioritization and balancing process to evaluate new demand or changes to existing project budgets and determine the most appropriate course of action. Newly identified projects must still proceed through the TIG process and may push other projects further down the priority list. In other situations, we may be able to accommodate a new project or expanded project scope or cost by approving an appropriate distribution of funds from Emergent Demand.

Q. WHAT IS EMERGENT DEMAND?

A. Emergent Demand is a capital investment category created to ensure we are able to meet the unanticipated aging technology, cyber security threats, and efficiency needs that inevitably emerge in each year. Given the ever-changing nature of technology and emerging risks, it is not possible to identify all projects

that may arise or become critical in a given year. For example, it is not always possible to predict what kind of security risk might be created by hackers as technology continues to develop. In other situations, as we develop a project with a particular scope, we may determine that additional benefits or long-term cost savings could be captured by expanding the scope of the project. Emergent Demand allows the Company to address such issues without necessarily delaying or cancelling previously planned projects or otherwise absorbing unplanned work and costs.

3. Capital Cost Controls

Q. IN ADDITION TO THE TIG PROCESS, DOES TECHNOLOGY SERVICES UNDERTAKE OTHER ONGOING STEPS TO CONTROL ITS COSTS?

A. Yes. Technology Services is continually taking steps to control costs. These efforts may include: increasing or decreasing the scope of outsourced services; increasing or decreasing the use of consultants; and changing service providers. We also use the Company's Supply Chain organization's competitive bidding practices and a multi-vendor sourcing strategy where possible, which enables the Company to utilize a combination of internal and external resources to minimize costs and maximize efficiencies in running our systems. In addition, Technology Services actively interacts with other IT organizations to learn how they control costs.

Q. CAN YOU PROVIDE MORE INFORMATION ABOUT THE COMPANY'S COMPETITIVE BIDDING PRACTICES?

A. Yes. Wherever possible, for the Company's key capital projects, the project team will use the Company's Supply Chain organization's competitive bid process to ensure that: (1) costs remain in line with the approved budget; (2)

Xcel Energy receives quality service at a fair price; and (3) business value is delivered per the agreed requirements. In addition, the project costs and schedules for these projects were based on internal experience with similar implementations and, in most cases, coupled with input from third-party consultants who we commissioned to ensure that the projects will deliver functionality that supports organizational objectives.

Generally, the only times a competitive bid process cannot be used are: (1) during upgrades to software or hardware components already provided by a vendor, in which engaging other providers would require a complete system overhaul; or (2) the limited times when multiple vendors are not available to undertake the necessary work or provide the necessary technology.

Q. CAN YOU IDENTIFY OTHER SPECIFIC COST CONTROL MEASURES THE COMPANY HAS UNDERTAKEN TO MANAGE COSTS?

A. Yes. When appropriate, we renegotiate contracts with key vendors and use a multi-vendor sourcing strategy to maintain competition between vendors for our business. One example is our increased use of fixed bid versus time and materials agreements with vendors for project delivery activities. This improvement places a shared burden on the service providers to ensure costs remain within the expected totals.

Q. CAN YOU EXPLAIN IN MORE DETAIL WHY A MULTI-VENDOR SOURCING STRATEGY IS BENEFICIAL?

A. Yes. Technology Services relies on approximately 50 different vendors for the majority of the capital investments and O&M support, with our top ten vendors comprising approximately 90 percent of our total costs. By utilizing multiple

vendors, we require these vendors to compete against each other for our business and create an incentive to keep the price of their services competitive. Overall, we are constantly managing spending, ensuring alliance with our budget, and looking for opportunities to control or reduce costs.

D. 2026 Capital Additions

Q. WHAT CAPITAL ADDITIONS IS TECHNOLOGY SERVICES PROPOSING TO MAKE IN 2026?

A. The NSPM (State of Minnesota Gas Jurisdiction) Technology Services 2026 capital additions are budgeted to be approximately $7.9 million. These investments are presented in the budget groupings aligning with the key investment needs described earlier in my testimony. This includes the Emergent Demand category that exists to support project changes in the other capital budget groupings. I will walk through the major projects for 2026 in each grouping in this section of my testimony, focusing on the capital additions.

Table 6
2026 Capital Additions
(Dollars in Millions)

State of Minnesota Gas Jurisdiction	2026
Project	**Test Year**
Aging Technology	$5.0
Cyber Security	0.9
Enhance Capabilities	1.8
Emergent Demand	0.2
Total	$7.9

*There may be differences between the sum of the individual category amounts and Total amounts due to rounding.

1. Aging Technology

Q. WHAT CAPITAL PROJECTS RELATED TO AGING TECHNOLOGY ARE INCLUDED IN THE 2026 TEST YEAR?

A. We anticipate a total of $5.0 million in capital additions in 2026 related to aging technology. In addition to routine annual refresh projects (also referred to as Lifecycle Management), we will be placing specific projects in service that will have a significant impact on our IT across the Company. The individual projects are shown in Table 7 below. I first discuss our annual, routine refresh projects and then I walk through each of the specific refresh projects in the following testimony.

Table 7
2026 Aging Technology Capital Additions
(Dollars in Millions)

State of Minnesota Gas Jurisdiction	2026
Project	**Test Year**
Lifecycle Management (LFCM)	$1.6
Integrated Risk Assessment System (IRAS) Replacement	0.9
Underground Gas Storage	0.4
Primavera (P6) Upgrade	0.3
OT Asset Management - Enterprise Field Device Management Solution	0.3
SW License Renewals - Infrastructure	0.2
WAN NSPMN	0.2
Facility IT Investments	0.2
Aging Technology small investments	0.8
Total	**$5.0**
*There may be differences between the sum of the individual category amounts and Total amounts due to rounding.	

Q. PLEASE DESCRIBE THE LIFECYCLE MANAGEMENT (LFCM) PROJECTS.

A. Given the breadth and depth of the different equipment Xcel Energy utilizes and manages, Technology Services refreshes smaller components of technology infrastructure on regular cycles. We annually budget for these replacements as routine refresh projects, which we also refer to as LFCM projects. LFCM projects refer to those projects that relate to updating or refreshing day-to-day technology on a routine basis. LFCM projects include LFCM – End User Services, LFCM – Network Services, LFCM – OT Modernization, and LFCM – Data Center. A summary of the refreshes we plan to undertake is set forth in Table 8 below.

Table 8
2026 LFCM Capital Additions
(Dollars in Millions)

State of Minnesota Gas Jurisdiction	2026
Project	**Test Year**
LFCM - End User Services	$0.5
LFCM - Network Services	0.7
LFCM - OT Modernization	0.1
LFCM - Data Center	0.4
Total	**$1.6**

Q. PLEASE BRIEFLY DESCRIBE THE DIFFERENT TYPES OF LFCM PROJECTS.

A. Below are descriptions of these refresh projects:

- *LFCM – End User Services:* This project involves replacement of personal computers (PCs) and other end user devices, such as laptops, desktops, tablets, rugged tablets, printers, and video conferencing equipment annually as they reach the end of their service life. These upgrades ensure

secure, reliable computing and collaboration capabilities for field and office staff.

- *LFCM – Network Services:* This project work involves planned replacement of network devices (switches, routers, radios, channel banks and voice systems) due to aging technology, out-of-support equipment, security vulnerabilities, and to enable new required capabilities.
- *LFCM – OT Modernization:* Lifecycle management for OT Modernization will help to replace and/or decommission active end of life equipment. The scope of this work will include Land Mobile Radio (LMR) replacements, Uninterrupted Power Supply remediations and battery replacements. End of life devices leave our network and infrastructure vulnerable; updates not installed can increase security risk.
- *LFCM – Data Center:* This project replaces data center infrastructure—including servers, storage systems, and other computer hardware—that is no longer cost-effective to support or that presents significant risk to operations due to aging components or lack of vendor support.

Q. HOW DOES TECHNOLOGY SERVICES DEVELOP ITS BUDGETS FOR REFRESH PROJECTS?

A. While the budget methodology varies depending on the nature of the assets to be refreshed, generally a refresh budget is determined by one or more of the following factors:

- The number of devices or systems that will reach end of life during the budget period. This is typically based on an established lifecycle plan. For example, PCs, mobile data terminals, and portable meter reading devices have a four-year life. Thus, approximately 25 percent of them are replaced in an average year.

- The number of devices expected to permanently fail outside warranty, and in the case of portable devices, the number expected to be damaged, lost, or broken. This is based on historical trends.
- Planned incremental growth in demand (e.g., data storage, network bandwidth, number of computer users, new physical sites, etc.). This is based on Company and industry trends and known business plans.
- The devices or systems that must be replaced to meet new security, software compatibility, or business requirements.
- The devices or systems for which vendor support will cease or become prohibitively expensive.

Overall, these refresh efforts result in an orderly, thoughtful, and cost-effective means of managing aging technology and replacing or upgrading them when they have met their manufacturers recommended useful lives.

Q. WHAT IS THE INTEGRATED RISK ASSESSMENT SYSTEM (IRAS) REPLACEMENT PROJECT?

A. This project modernizes risk modeling for Xcel Energy's natural gas transmission system by replacing the outdated IRAS platform. The new system consolidates multiple models for gas transmission and distribution into the JANA Lighthouse platform, enabling comprehensive analysis of pipeline assets. It supports compliance with American Standard of Mechanical Engineers (ASME) B31.8S by incorporating geospatial data, inspection results, and expert evaluations from engineers and field specialists. Engineering and operations

teams will benefit from streamlined workflows and reduced manual effort, allowing for more effective planning and mitigation.

Q. WHAT IS THE UNDERGROUND GAS STORAGE PROJECT?

A. This project upgrades risk modeling for Xcel Energy's underground gas storage facilities by replacing a spreadsheet-based internal tool with JANA Lighthouse Storage, a commercial software platform purpose-built for storage assets. The new system incorporates threat interaction logic and integrity test data to produce more accurate risk scores and maintenance prioritization. It also integrates with existing distribution risk models to provide a unified view of system health. Used by gas operations and compliance teams, the platform improves data organization, reduces manual effort, and strengthens visibility into storage-specific risks. By adopting a proven solution already in use for other gas assets, the project delivers a compliant, scalable framework that supports long-term planning and operational efficiency.

Q. WHAT IS THE PRIMAVERA (P6) UPGRADE PROJECT?

A. The objective of this project is to upgrade all Primavera environments to a current, cloud-hosted version to address aging software and restore full vendor support. Primavera is used across Gas, Transmission, Energy Supply, Nuclear, and Distribution to manage capital projects and overhauls, supporting scheduling, resource planning, and coordination. The current version is nearing end-of-support and has become increasingly unstable, with persistent publishing failures affecting over 1,600 users. Upgrading will resolve these disruptions, eliminate remote desktop access issues, and improve performance, transparency, and user experience across business units.

Q. WHAT IS THE OT ASSET MANAGEMENT – ENTERPRISE FIELD DEVICE MANAGEMENT SOLUTION PROJECT?

A. This project is part of a larger effort to enhance operations asset security, increase operational efficiency and maintain CIP compliance. This project is focused on collecting, tagging, and centrally storing substation and other digital field communication device asset data into a common repository that can then be used by the technology implemented in the related OT Asset Management - Enterprise Asset Configuration Project, planned to go into service in 2027. Given the sensitive nature of the information associated with these critical assets, including passwords, IP addresses and configuration details, these data must be stored separately from other Company information.

Q. WHAT IS THE SW LICENSE RENEWALS – INFRASTRUCTURE PROJECT?

A. The objective of this project is to ensure uninterrupted operation of Xcel Energy's enterprise infrastructure by renewing critical software licenses that support core business systems. These licenses enable essential services such as data processing, communication, and infrastructure management across IT and operations. By proactively addressing license lifecycle needs, the project supports long-term system reliability and reduces the risk of service disruptions due to expired or unsupported software. The licenses renewed include foundational technologies that enable secure, scalable infrastructure automation—Red Hat Enterprise Linux (RHEL) software provides a stable enterprise-grade Linux operating system across diverse environments, while Ansible streamlines configuration, deployment, and task automation through playbooks, software for running multiple systems on one server (VMware), accessing company databases and financial systems (Oracle), using AI to speed up tasks like writing and analyzing data (Microsoft Copilot), editing and sharing

documents (Adobe Acrobat), keeping online services running smoothly (VMware Avi Load Balancer), managing company servers (VMware Core), and supporting secure communication and teamwork (Microsoft 365 E5). Together, these tools help teams stay productive, protect company data, and meet business and regulatory needs.

Q. WHAT IS THE WIDE AREA NETWORK (WAN) NSPM PROJECT?

A. This project upgrades aging WAN infrastructure across NSPM to ensure reliable connectivity for enterprise systems and operational technologies. It replaces outdated routers, switches, firewalls, and wireless access points that no longer meet performance standards, posing risks to SCADA connectivity and business operations. The modernization supports mission-critical traffic, improves access to applications like SAP and email, and reduces downtime. IT and operations teams, including those supporting gas infrastructure, will benefit from improved access to applications like SAP and email, reduced downtime, and a secure network foundation that supports regulatory and safety requirements.

Q. WHAT IS THE FACILITY IT INVESTMENTS PROJECT?

A. The objective of this project is to deploy secure and reliable IT infrastructure at new or remodeled service centers. It includes installation of routers, switches, cabling, wireless access points, and firewalls to support connectivity and protect enterprise systems. These investments enable employees to perform essential functions efficiently and ensure alignment between Property Services and Technology Services, supporting operational continuity across locations.

Q. PLEASE DESCRIBE AGING TECHNOLOGY SMALL INVESTMENTS PROJECTS THAT THE COMPANY IS PLACING IN SERVICE IN 2026.

A. The Company is also placing in service many other smaller projects in 2026 that will address aging IT needs. These smaller projects include work like PowerPlan Upgrade, Lumen Renewal, and Informatica Lifecycle Management (ILM) Replacement. These smaller projects also enable the Company to keep systems reasonably upgraded to continue to meet business, reliability, or compliance needs.

2. Cyber Security

Q. WHAT CAPITAL PROJECTS RELATED TO EVOLVING CYBER SECURITY THREATS AND REQUIREMENTS ARE INCLUDED IN THE 2026 TEST YEAR?

A. We anticipate a total of $0.9 million in capital additions in 2026 related to cyber security as shown in Table 9 below. I discuss the projects that comprise the majority of the 2026 cyber security capital additions in the following testimony.

Table 9
2026 Cyber Security Capital Additions
(Dollars in Millions)

State of Minnesota Gas Jurisdiction	2026
Project	**Test Year**
Cloud Vulnerability Scanning	$0.2
OT Full Packet Capture	$0.2
Incident Management Hub	$0.1
OT Situational Awareness & Event Management	$0.1
Cyber Security small investments	$0.3
Total	**$0.9**
*There may be differences between the sum of the individual category amounts and Total amounts due to rounding.	

Q. CAN YOU PROVIDE ADDITIONAL DETAIL REGARDING THESE PROJECTS?

A. Yes:

- *The Cloud Vulnerability Scanning Project* is expected to strengthen cybersecurity by implementing a centralized tool that continuously scans Xcel Energy's cloud and hybrid environments for vulnerabilities. This solution replaces fragmented monitoring methods with a unified platform that detects misconfigurations, outdated software, and other risks across applications and infrastructure. Without it, the company faces increased exposure to cyberattacks, degraded system performance, and potential non-compliance with standards such as NERC CIP and ISO 27001. The project enhances visibility, supports regulatory alignment, and helps protect critical services—including gas and electric operations—by enabling faster, more effective threat response.
- *The OT Full Packet Capture Project* objective is to implement full packet capture capabilities across operational technology environments to enhance threat detection, forensic analysis, and incident response. It introduces advanced monitoring tools that record all network traffic, enabling deep visibility into OT system behavior and vulnerabilities. Without this capability, security teams lack the data needed to investigate breaches or anomalies, increasing risk to critical infrastructure. The project will deliver improved situational awareness, faster response times, and strengthened compliance with cybersecurity standards.
- *The Incident Management Hub Project* objective is to transform how Xcel Energy manages emergencies and operational disruptions by deploying a centralized platform that replaces scattered tools. It enables coordinated response across field crews, corporate teams, and external agencies through shared data, real-time mapping, and full lifecycle incident

tracking. By standardizing communication and decision-making processes, the solution enhances safety, resource management, and multi-agency collaboration during physical events such as storms, outages, or infrastructure failures.

- *The OT Situational Awareness & Event Management project* objective is to strengthen cybersecurity and operational resilience within OT environments by consolidating fragmented monitoring systems into a unified event management platform. It integrates data from sensors, endpoint detection, and network tools to enable real-time threat detection and automated incident response. Unlike enterprise-wide emergency coordination, this solution is tailored to OT teams and infrastructure, reducing alert fatigue and improving visibility into digital risks that could compromise critical systems.
- Other cyber security projects that the Company is placing in service in 2026 include investments that provide prevention, detection, containment, and corrective services to protect the Company from security incidents and assist in the recovery from any adverse events. These refreshes of technology help ensure continued compliance with regulatory requirements for customer data and overall corporate security objectives, while reducing our business's and our customers' exposure to evolving cyber security risks and vulnerabilities.

3. Enhancing Capabilities

Q. WHAT CAPITAL PROJECTS RELATED TO ENHANCING COMPANY CAPABILITIES ARE INCLUDED IN THE 2026 TEST YEAR?

A. We anticipate a total of $1.8 million in capital additions in 2026 related to enhancing capabilities, as shown in Table 10 below. I discuss the projects that

comprise the majority of the 2026 enhancing capabilities capital additions in the following testimony.

Table 10
2026 Enhancing Capabilities Capital Additions
(Dollars in Millions)

State of Minnesota Gas Jurisdiction	2026
Project	**Test Year**
Blackline Dual Detection and Comm Devices	$0.6
Private LTE	0.6
Integrated Systems Planning - Unified Data Platform Enabled Load Forecasting	0.1
Enhance Capabilities small investments	0.5
Total	**$1.8**
*There may be differences between the sum of the individual category amounts and Total amounts due to rounding.	

Q. WHAT IS THE BLACKLINE DUAL DETECTION AND COMM DEVICES PROJECT?

A. This project introduces satellite- and cellular-connected safety devices to replace legacy communication and gas detection tools used by frontline gas operations personnel. The new equipment enhances lone worker safety, enables real-time connectivity in remote areas, and supports faster emergency response. Field crews will benefit from improved situational awareness and reliable communication, even in low-signal environments. The deployment helps mitigate safety risks and supports compliance with operational protocols. The outcome is a modernized safety and detection framework that protects employees, improves public safety, and strengthens field operations.

Q. WHAT IS THE PRIVATE LONG-TERM EVOLUTION (LTE) PROJECT?

A. The Private LTE project serves both electric and gas assets, with the amounts in this case being the gas utility portions. The Private LTE project enhances the Company's capabilities with regard to its SCADA system, which is a system used by Xcel Energy to monitor and control complex gas processes and equipment in real-time. Under this project, the Company is in the process of deploying its own private LTE wireless network across its service area, which will supplement the LTE communications network that is currently provided by a third-party telecommunications company. The Private LTE project will improve the resiliency and security of the gas SCADA environment by having an additional layer of connectivity over the current, public communications network, which the Company will continue to utilize as a backup service. Because of this redundant design, there will be fewer outages and fewer instances of field workers being dispatched when communications are lost.

One of the main benefits of having a private LTE network is the security of information related to the Company's natural gas distribution system (critical to ensuring safe and reliable service for our customers), which will route through the Company's private LTE system rather than the third-party's public communications network. There are also other key benefits, such as the Company's ability to more efficiently scale up and accommodate the future expansion of IoT devices (Internet of Things devices with sensors and other applications) that are integral to our natural gas operations. Once a particular geographical area is covered by private LTE, adding additional devices and sensors has minimal to no additional costs to the network. Implementation of the Private LTE project began in 2023 to support large-scale deployment and management of field devices, which require a more robust and consistent

connectivity solution than public cellular networks can provide. This timing aligns with the Company's strategy to manage long-term operational costs and ensure scalable, secure communications infrastructure for gas operations.

Q. WHAT IS THE INTEGRATED SYSTEMS PLANNING – UNIFIED DATA PLATFORM ENABLED LOAD FORECASTING PROJECT?

A. The objective of this project is to modernize load forecasting by creating a new tool and automating data migration within the Unified Data Platform (UDP). Current forecasting processes are fragmented and inefficient, limiting visibility into future demand for gas and electric systems. The new platform will support more accurate modeling of consumption patterns—such as weather, technology adoption, and energy efficiency—across Gas, Distribution, Transmission, and Generation. This enables better capital planning, regulatory alignment, and readiness for a transition to distributed and variable energy resources.

Q. WHAT ARE OTHER ENHANCE CAPABILITIES SMALL INVESTMENTS THAT ARE BEING PLACED IN SERVICE IN 2026?

A. The Company is also placing in service many other smaller projects in 2026 that will enhance the Company's capabilities. These smaller projects, like large projects, also enable the Company to improve productivity, enhance communications between systems, and between people, and use data more efficiently. Examples of these projects are the SAP Warehouse Management, ServiceNow AI module (Now Assist), and the Rice Street Move.

4. Emergent Demand

Q. DOES TECHNOLOGY SERVICES INCLUDE EMERGENT DEMAND IN ITS 2026 BUDGET?

A. Yes, our 2026 budget for Emergent Demand includes $0.2 allocated to the State of Minnesota Gas Jurisdiction.

Q. HOW DID THE COMPANY ESTABLISH THE EMERGENT DEMAND BUDGET FOR THE 2026 TEST YEAR?

A. The current budget is based on business priorities for the year, balanced by the overall business area capital spending guidelines. In other words, the Emergent Demand budget reflects the need to ensure adequate funds for emerging technology needs – whether emerging new projects or enhancements to currently planned projects. IT projects funded by Emergent Demand will be approved through our TIG process I identified above, in accordance with our budget process. Emergent Demand provides Technology Services with the ability to assess and address, as appropriate, emerging technology needs as they arise. For instance, we may identify a risk associated with existing technology that needs to be addressed earlier than initially planned. In other instances, we might begin implementing new software and then learn of a new function that is cost-effective to adopt at the same time the project is implemented. Whether the funding requirement is from a scope change to an existing project, or to address a new risk or a new identified need, Emergent Demand allows us to effectively ensure adequate funding for projects that cannot always be predicted in our fast-changing environment. In addition, Emergent Demand allows us to more comprehensively vet requested changes in individual project scope. Before a project team can access Emergent Demand funds, a project must again be reviewed and approved under the TIG process.

Q. CAN YOU EXPLAIN IN MORE DETAIL HOW REQUESTS FOR FUNDING FROM EMERGENT DEMAND ARE REVIEWED?

A. Yes. Requests for funds from Emergent Demand, including any request that may arise for a new project or for more funding on an existing project, are reviewed to ensure need. Emergent Demand therefore provides another layer of governance for existing projects, because they must receive an additional round of approval before being allocated funds from Emergent Demand.

IV. O&M BUDGET

A. O&M Overview

Q. WHAT IS INCLUDED IN THE TECHNOLOGY SERVICES O&M BUDGET?

A. The Technology Services O&M budget consists of costs related to the operation and maintenance of existing IT assets such as software systems, computers, printers, phones, radio systems, and servers. It also includes annual software contract and license fees, as well as maintenance agreements, for existing software and hardware. In addition, the O&M budget includes non-capitalized costs associated with developing, enhancing, and maintaining new or existing IT systems.

Q. WHAT IS THE COMPANY'S TECHNOLOGY SERVICES' O&M BUDGET FOR THE 2026 TEST YEAR?

A. The total Technology Services O&M budget for the 2026 test year is $12.7 million. The basis for this budget is set forth in detail below. I present the Technology Services O&M budget for the State of Minnesota Gas Jurisdiction.

Q. WHAT ARE THE BASIC CATEGORIES OF THE O&M BUDGET?

A. The five-year Technology Services O&M budget can be broken down into eight categories: (1) Network Services; (2) Software License and Maintenance; (3) Company Labor; (4) Application Development and Maintenance; (5) Contract Labor and Consulting; (6) Shared Assets Allocation; (7) Hardware Purchases and Maintenance (including equipment maintenance); (8) Other. Table 11 below shows the 2026 Technology Services O&M budget by category, in addition to actuals for 2022-2024 and the 2025 forecast:

Table 11
O&M Budget by Category

Cost Category	2022 Actuals	2023 Actuals	2024 Actual	2025 Actual/Forecast	2026 Budget
Network Services	0.7	1.0	1.0	1.0	1.4
Software License and Maintenance	3.0	3.3	3.2	2.9	3.6
Company Labor	1.7	1.8	1.8	1.8	1.9
Application Development & Maintenance	1.2	0.6	0.7	0.5	0.6
Contract Labor/Consulting	1.0	0.6	0.6	0.8	1.8
Shared Assets	1.9	2.2	2.4	2.8	3.0
Hardware Maintenance	0.2	0.3	0.3	0.2	0.2
Other	0.2	0.1	0.2	0.1	0.2
Total	**9.9**	**10.0**	**10.1**	**10.2**	**12.7**

Q. HOW DOES THE 2026 BUDGET COMPARE TO 2025?

A. While the Company's O&M costs have been relatively flat over the last several years, the Company anticipates higher O&M in 2026, with the largest increases being in the categories of Network Services, Software Maintenance, and increasing workforce costs. As I describe below, Network Services and Software

Maintenance are increasing as a result of increasing network data needs and usage, and increasing software needs and licensing fees. Our initial phases of work on the CIS replacement, noted earlier in my Direct Testimony, are also driving increased contractor costs. Exhibit___(MNS-1), Schedules 3 and 4 provide a further breakdown of O&M costs by cost element and FERC Account, respectively. I describe our O&M budget process and categories in more detail below.

B. O&M Budget Process

Q. HOW DOES THE COMPANY SET THE O&M BUDGET FOR THE TECHNOLOGY SERVICES BUSINESS UNIT?

A. Our O&M budget process is similar to our capital budget process in that both are based on a partnership between corporate management of overall finances and the business needs we identify. Company witness Robinson explains how the Company establishes business area O&M spending guidelines and budgets based on financing availability, specific needs of business areas, and overall needs of the Company. Overall, we establish a reasonable annual O&M level that allows Technology Services to complete priorities that are important to providing a reasonable level of services to the Company and our customers.

Q. DOES TECHNOLOGY SERVICES EVER NEED TO CHANGE THE USE OF BUDGETED O&M FUNDS DURING THE FINANCIAL YEAR?

A. Yes. As mentioned earlier in my testimony, Technology Services adjusts for changing business impacts such as updates in technology, customer expectations, operating priorities of the business units across the Company, and the Company finance area. There are times when O&M funds are shifted within

Technology Services' individual budget categories during the year, typically to address unplanned requirements and re-prioritized needs of the business.

Q. HOW DOES THE COMPANY DETERMINE CHANGES IN THE TECHNOLOGY SERVICES O&M BUDGET FOR FUTURE YEARS?

A. As part of the Company's annual budget process, Technology Services performs a review of existing services and expected new services to determine budget needs for future years. This includes an evaluation of annual contract cost escalators for vendors, annual merit increases, changes in the quantity of services estimated to be consumed, and new services. This information is reviewed and evaluated through the budget process and a budget is established for Technology Services for future years.

Q DOES THE COMPANY HAVE A PROCESS FOR MITIGATING DEVIATIONS IN ACTUAL EXPENDITURES COMPARED TO BUDGETED EXPENDITURES?

A. Yes. As I previously described for the capital budget, Technology Services management monitors actual versus budget expenditures for both capital and O&M efforts on a monthly basis. Deviations are evaluated and action plans are developed to mitigate variations in actual to budgeted expenditures. These mitigation plans may either reduce or delay other expenditures to support the overall authorized budget. If authorized budget adjustments are required, they are identified and approved at an appropriate level of management.

C. O&M Budget Detail

Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?

A. In this section, I describe in detail the components of Technology Services that make up the O&M budget. I will describe each component, discuss any changes

to O&M for that component over the course of the 2026 test year, and discuss ways that the Company mitigates O&M cost growth for that particular component.

1. Network Services

Q. WHAT ARE NETWORK SERVICES?

A. This category includes costs related to the maintenance of existing telecommunication circuits, telephone systems, fiber, microwave and radio communications, and other IT network infrastructure assets. Network activities provide operation and management of the Company's internal and external data transmission requirements. Network services are budgeted based on a price times a quantity. These costs are dependent upon Xcel Energy's service usage levels and the number of assets in use. As additional IT assets and services are expanded to meet business demand, corresponding network maintenance costs tend to rise.

Q. WHAT NETWORK ENHANCEMENTS COST CHANGES ARE YOU ANTICIPATING DURING THE 2026 TEST YEAR?

A. Network services costs in 2026 reflect the increased usage of the organization's network to support new applications and demand for greater speed and capacity to support existing systems. These usage and demand needs generally increase year-over-year as technology advances, which means that new requirements or capabilities are identified and sites are added, meaning, networks are added at new locations. To mitigate these cost pressures, the Company has implemented several strategies, including contract renegotiations, transitioning circuits from legacy to more cost-effective fiber technology, and disconnecting unused network services where conflation is feasible.

Network services also include the ongoing need to upgrade and replace aging infrastructure. For example, legacy SCADA circuits used for transmission and distribution—originally based on analog technology—are now being replaced with digital alternatives that require regular maintenance. Additionally, the Company has invested in expanding wireless networks across offices and service centers to enhance productivity. These new deployments introduce additional assets that must be maintained, contributing to O&M expenses. Furthermore, capital investments in network projects, as outlined in the capital section of this testimony, are designed to support future growth, maintain cyber security standards and help manage long-term O&M costs.

2. Software License and Maintenance

Q. WHAT IS SOFTWARE LICENSE AND MAINTENANCE?

A. This category includes expenses for payments to vendors for license agreements associated with various applications and desktop tools used by the Company to perform services. These payments cover updates, support patches, fixes and technical support.

Q. WHAT SOFTWARE LICENSE AND MAINTENANCE COST CHANGES ARE YOU ANTICIPATING FOR THE 2026 TEST YEAR?

A. There are two major drivers of increases in the 2026 test year, stemming overall from increasing costs in the industry. First, there are increased licensing costs driven by users, escalators in contracts, and upgrades such as Salesforce and Bentley. Second, software must be continually maintained and supported to limit vulnerabilities, resulting in increased costs in the 2026 test year. With cyber security threats increasing all the time, it is more important than ever to keep software maintenance current and in support.

Q. PLEASE DISCUSS EFFORTS TO MINIMIZE INCREASES IN SOFTWARE MAINTENANCE COSTS.

A. There are several efforts used to reduce the growth in this category. First, we evaluate the need for maintenance support on applications that will be replaced to make sure we are buying the appropriate licenses to support the business needs. Second, we evaluate the usage of desktop software to determine if the usage justifies the continued need for a product. For example, if a computer user has not used a software product recently, we redeploy the license to a user who has requested the software, thereby avoiding the need to purchase a new license for that user. Finally, we review contracts with vendors as part of the contract renewal process to reduce costs. For example, we might extend the term of a maintenance agreement in order to receive a larger discount, right-size a contract to align to actual usage, or cancel a contract altogether.

3. Company Labor

Q. WHAT COMPANY LABOR COSTS ARE INCLUDED IN THE TECHNOLOGY SERVICES O&M BUDGET?

A. Our labor costs include the cost associated with all employees in the Technology Services department.

Q. WHAT COMPANY LABOR COST CHANGES DO YOU ANTICIPATE FOR THE 2026 TEST YEAR?

A. Labor costs for the test year are $1.9 million. Overall, the Company labor trend has remained relatively flat by managing attrition and keeping positions open for longer periods of time.

Q. PLEASE DISCUSS EFFORTS TO ENSURE A REASONABLE LEVEL OF COMPANY LABOR COSTS.

A. Company labor costs are based on the employee headcount required to provide IT services to the organization. The employee headcount is managed through a workforce plan process that monitors changes and includes attrition information as well as emergent needs. Changes to employee headcount for replacement related to attrition or for new headcount require assessment of the need for the personnel, the associated risks with not filling the position, and alternative options. This process has worked effectively and assures we have the correct resources in place with the right skills and allows us to manage costs.

4. Application Development and Maintenance

Q. WHAT IS APPLICATION DEVELOPMENT AND MAINTENANCE (ADM)?

A. ADM includes costs of services to develop, enhance, maintain, and consult on new or existing IT software and hardware applications.

Q. WHAT ADM COST CHANGES DO YOU ANTICIPATE FOR THE 2026 TEST YEAR?

A. ADM costs have modestly decreased over the past several years and are forecasted to continue to do so during the test year. This trend is largely due to efficiency gains that have resulted in lower costs going forward for the Company, but which could be offset by added software programs in the future. In addition, we continue to thoroughly evaluate our application portfolio on a regular basis and strive to limit incurring ADM costs for applications that are anticipated to be replaced in the near future. For the 2026 test year, the Company has budgeted $.6 million, which reflects a decrease in ADM costs compared to prior years.

5. Contract Labor and Consulting

Q. WHAT COSTS ARE INCLUDED IN THE BUDGET AS CONTRACT LABOR AND CONSULTING?

A. These costs consist of fees and expenses for professional consultants or knowledge-based experts that are not employees of the Company. This category also includes staff augmentation through staffing agencies.

Q. WHAT CONTRACT LABOR COST CHANGES DO YOU ANTICIPATE FOR THE 2026 TEST YEAR?

A. Contract labor costs are forecast to be at $.8 million in 2025 and $1.8 million in 2026. Actuals from 2022-2024 were between $.6 million and $1.0 million, resulting from our appropriate management of contractor work to meet changing needs. Contract labor is utilized to provide supplemental capacity to the Company's internal labor within the program, based upon the skills necessary to perform the work. A portion of the increase in contract labor in 2026 is due to the initial planning stages related to the planned replacement of the Customer Information System.

Q. WHAT CONTRACT LABOR COST CHANGES DO YOU ANTICIPATE RELATED TO THE CUSTOMER INFORMATION SYSTEM?

A. The budget supports essential upfront O&M activities required during the development of large technology projects. As the Customer Information System Modernization program initiates blueprinting and design activities in 2026, the program expects contract labor to be increased as a supplement for internal labor capacity within the program. Example of some areas of 2026 program contract labor costs include change management activities, quality assurance tasks, administrative and program management activities. Anticipated

O&M increases for Contract Labor are expected over the next few years as we continue work to implement the CIS Project. As the project advances, we will continue to refine financial estimates related to labor, maintenance, and hardware for financial accuracy.

6. Shared Asset Allocation

Q. WHAT IS SHARED ASSET ALLOCATION?

A. This category reflects the allocation of Technology Services costs to or from the NSPM operating company, depending on where the asset was purchased and how an investment will be utilized between Xcel Energy operating companies. The dollars associated with this category are, in a sense, a true-up of costs related to a certain investment by assigning to the appropriate jurisdiction(s). This number fluctuates in part on the basis of the jurisdiction in which an investment is purchased consistent with our capital asset and cost allocation policies discussed by Company witnesses Michele A. Kietzman and Nicole L. Doyle. For example, the dollars in this account will decrease when an asset is purchased in NSPM but is also utilized in other operating companies. For years 2024, $2.4 million, 2025 $2.8 million, and 2026 $3.0 million.

7. Hardware Purchases and Maintenance

Q. WHAT IS INCLUDED IN THE HARDWARE PURCHASES AND MAINTENANCE CATEGORY?

A. Our hardware maintenance costs relate largely to vendor contracts we maintain to support hardware systems. This cost category also includes miscellaneous hardware equipment purchases for materials such as batteries, memory cards, keyboards, headsets, and related technical tools.

Q. WHAT HARDWARE PURCHASES AND MAINTENANCE COST CHANGES DO YOU ANTICIPATE FOR THE 2026 TEST YEAR?

A. Costs for this category are expected to fluctuate based on the work being performed and is forecasted to be $.2 million in 2025 and $.2 million in 2026. The overall costs in this category are therefore expected to remain relatively flat.

8. Other

Q. WHAT CHANGES IN "OTHER" TECHNOLOGY SERVICES O&M EXPENSE DO YOU ANTICIPATE FOR THE 2026 TEST YEAR?

A. Costs in this category represent a variety of costs for the Technology Services business area that do not fit in the cost categories that I previously walked through. These costs overall are forecasted to be approximately $.1 million for the 2025 year and approximately $.2 million for the 2026 test year.

Q. WHAT DO YOU CONCLUDE ABOUT TECHNOLOGY SERVICES' O&M COSTS OVERALL?

A. We have worked hard in recent years to contain O&M costs, which is reflected in the number of O&M categories with flat expense levels and budgets between past and future years. Where costs are rising, this is due to increased investment in capital or new initiatives, as well as increased demand for technology services, such as network and support. In turn, these increases in demand are consistent with the overall direction and rising needs for IT services in all types of businesses. As such, our O&M cost levels reflect prudent management and cost containment.

V. CONCLUSION

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. I recommend that the Commission approve the Technology Services capital and O&M budget presented in this rate case. Our planned capital investments are managed appropriately and established to address aging technology, cyber security, enhanced capabilities, and emerging demand for the Company. The budgets we propose are a reasonable representation of the activities we will undertake on behalf of the Company and ultimately our service to customers through 2026 and beyond.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does.

Statement of Qualifications

Megan N. Scheller

Megan Scheller became the Sr. Director, Product Management, overseeing the Governance, Strategy, and Performance team for Technology Services in January 2024. Megan's accountabilities in this role include improving and standardizing IT processes, such as IT strategy, financial management, and aligning enterprise IT plans with Company objectives. In her previous role, Megan was responsible for planning and executing the customer technology portfolio, with an emphasis on delivering technology to enhance our customer's digital experience. Megan has seventeen (17) years of experience in the field of Customer Experience and Strategy, with twelve (12) of those years in a leadership role. She joined Xcel Energy in October 2006 where she began her career developing and marketing Energy Efficiency programs. In 2013 Megan launched the Customer Experience organization, which quickly evolved into driving new digital experiences to meet evolving customer expectations. In 2016, Megan added the development of the voice of the customer insights program along with our brand and advertising strategy and execution to her scope. In 2019, Megan used her expertise to lead the Customer Experience Transformation in the simplification of our technology and the development of new channels and experiences for our customers.

Megan graduated from the University of St. Cloud, Minnesota, where she earned a bachelor's degree in advertising and marketing. She earned a Master of Business Administration from Capella University.

Schedule 2
Capital Investment Additions

MN Gas Witness (see note)	Scheller
Item Desc	CWIP Closings

Sum of MN Allocated			Activity Year				
Major Category	**Project ID**	**Testimony Name**	**2022**	**2023**	**2024**	**2025**	**2026**
Aging Technology	**D.0000129.004**	Lumen Renewal					(123,148)
	D.0000166.001	OT Shared Services Platform			(78,676)	(7,740)	
	D.0001917.001	LMR IP Enablement				(11,141)	
	D.0001917.005	LMR IP Enablement				(104,431)	
	D.0001926.012	ESB Modernization			(10,134)		
	D.0001927.001	Marshall Operation Center - MOC			(667,630)	(1,885)	
	D.0001944.001	Handheld Mobile Collector Refresh		(58,229)	(3,172)		
	D.0002011.013	WAN NSPMN	(126,952)	(175,443)	(195,317)	(279,852)	(227,664)
	D.0002011.018	WAN NSPMN				(17)	
	D.0002020.085	SAP Continuous Improvements Placeholder			(222)	(81)	
	D.0002021.001	Facility IT Investments	(34,971)	(126,483)	(146)		
	D.0002021.017	Facility IT Investments			(18,226)		
	D.0002021.021	Facility IT Investments			(87,513)		
	D.0002021.023	Facility IT Investments				(615)	(7,575)
	D.0002021.034	Facility IT Investments				(96,828)	
	D.0002021.035	Facility IT Investments			(18,244)	(207)	
	D.0002021.037	Facility IT Investments					(53,160)
	D.0002021.041	Facility IT Investments				(31,807)	
	D.0002021.044	Facility IT Investments				(85,743)	
	D.0002021.050	Facility IT Investments			(19,279)		
	D.0002021.054	Facility IT Investments					(96,342)
	D.0002021.057	Facility IT Investments				(4,704)	
	D.0002082.027	Video Conferencing Enablement		(86,545)	(4,673)		
	D.0002082.031	Video Conferencing Enablement			(29,194)	(29,871)	
	D.0002106.017	VoIP Refresh			(65,614)	(31,073)	
	D.0002106.029	VoIP Refresh		(135,747)	(3,298)		
	D.0002106.033	VoIP Refresh					(5,534)
	D.0002109.005	LFCM - End User Services	(24,184)	(20,535)	(85,311)	(914)	
	D.0002125.037	DR Technology Refresh		(26,496)	(604)		
	D.0002125.043	DR Technology Refresh				1,484	
	D.0002223.012	Customer Care IVR Upgrades				3,808	
	D.0002286.021	PI For DC5 Electric		(9,005)	9,281		
	D.0002354.001	LFCM - End User Services	(176,494)	(261,792)	(205,766)	(133,612)	
	D.0002355.001	LFCM - End User Services	(46,460)	(50,499)	(39,639)	(5,468)	
	D.0002356.001	LFCM - Network Services	(103,582)	(120,659)	(293,618)	(39,533)	(315,703)
	D.0002376.027	Infrastructure Modernization		(35,667)	(633)	325	
	D.0002376.049	Infrastructure Modernization		(6,934)	(657)	489	
	D.0002376.055	Infrastructure Modernization		(66,801)	(19,798)	15,720	
	D.0002376.061	Infrastructure Modernization			(27,782)	1,888	
	D.0002376.063	Infrastructure Modernization			(50,713)	(12)	
	D.0002376.066	Infrastructure Modernization			(34,046)	(1,638)	
	D.0002376.068	Infrastructure Modernization				8	
	D.0002482.005	LFCM - End User Services	(84,570)	(10,307)	(173,967)	(208)	
	D.0002485.001	LFCM - Network Services					(390,148)
	D.0002485.029	LFCM - Network Services			(118,295)	(44,642)	
	D.0002485.033	LFCM - Network Services			(172,977)	(338,285)	
	D.0002488.005	LFCM - OT Modernization	(108,059)	(147,891)	(31,347)	(59,549)	(65,025)
	D.0002489.005	LFCM - Data Center	(37,181)	(169,602)	(169,297)	(10,096)	
	D.0002500.001	Fabric Refresh	(155,812)	(15,487)	8,452	4,526	
	D.0002500.015	Fabric Refresh		(19,581)	(20,055)		
	D.0002500.019	Fabric Refresh			(134,008)	(25,765)	
	D.0002518.001	LFCM - Data Center	(305,739)	(224,280)	(423,138)	(127,465)	
	D.0001726.055	Work and Asset Ph 1	(81)		862		
	D.0000071.004	Informatica Lifecycle Management (ILM) Replacement				(4,667)	
	D.0000164.001	Telecom Expense Management (TEM) Renewal (carrier access)			(91,868)		
	D.0001804.293	eSOMS Project				(37)	
	D.0001804.303	Distribution Records Mgmt aka Fed Records Mgmt			505		
	D.0001804.355	CIP Substation Compliance Reporting Work Stream 2		(679,782)	1,053		
	D.0001826.158	Verint Workforce Management upgrade or replacment PROJECT				2,759	
	D.0001856.001	Monitoring Device Management System (MDMS) Replacement			(882,596)	(27,046)	
	D.0001926.007	ESB Modernization				(420,807)	
	D.0001933.009	Essential Suite migration to Sphera Cloud					(72,054)
	D.0001935.003	Fleet Asset Upgrade		(12,388)	(8)		
	D.0001939.015	SharePoint on-premises Upgrade			(43,769)	1,389	
	D.0001940.007	End User Services Enhancements	(34,443)	(19,856)	(174)		
	D.0001940.017	End User Services Enhancements			(49,494)	(12)	
	D.0001949.001	IVR Phase 3					(70,835)
	D.0001965.003	HANA Sidecar Reporting			(3,755)		
	D.0001988.003	Archer Enhancements	(23,919)	(11,452)	(137)		
	D.0001988.010	Archer Enhancements		(48,620)	13		
	D.0001988.019	Archer Enhancements			(6,004)	(46)	
	D.0001988.023	Archer Enhancements			(27,891)	8	
	D.0001990.061	SW License Renewals - App Del			(16,250)		
	D.0001990.071	SW License Renewals - App Del			(71,647)		
	D.0001990.073	SW License Renewals - App Del			(16,947)	(173)	
	D.0001994.041	SW License Renewals - Infrastructure				(372,023)	(229,309)

Sum of MN Allocated			Activity Year				
Major Category	Project ID	Testimony Name	2022	2023	2024	2025	2026
	D.0001994.053	SW License Renewals - Infrastructure			(18,503)	(1,698)	
	D.0001994.072	SW License Renewals - Infrastructure			(39,860)		
	D.0001994.081	SW License Renewals - Infrastructure			(65,175)		
	D.0001994.085	SW License Renewals - Infrastructure			(25,942)		
	D.0001994.090	SW License Renewals - Infrastructure			(28,578)		
	D.0001994.095	SW License Renewals - Infrastructure			(4,667)		
	D.0001994.112	SW License Renewals - Infrastructure			(15,484)		
	D.0002020.015	SAP Continuous Improvements Placeholder				(36,230)	(36,651)
	D.0002020.071	SAP Continuous Improvements Placeholder		(40,108)	(0)		
	D.0002020.077	SAP Continuous Improvements Placeholder			(49,391)	(15)	
	D.0002044.008	Enterprise Metadata Management			(109,956)		
	D.0002054.006	GOLD Replacement			(547,516)	(13)	
	D.0002125.029	DR Technology Refresh		(54,424)	(141)		
	D.0002153.023	Technology License		(2,704,440)	(26,738)	(2,556)	
	D.0002153.034	Technology License			(5,811)		
	D.0002161.017	OSI Soft PI Enterprise Agreement			(145,005)		
	D.0002223.006	Customer Care IVR Upgrades				(1,001,210)	
	D.0002240.002	Core HR Application (Payroll Benefits)		(281,029)	(11,748)		
	D.0002240.006	Core HR Application (Payroll Benefits)		(1,672,042)	(3,198)		
	D.0002240.014	Core HR Application (Payroll Benefits)	(351,490)	(56,868)	3		
	D.0002262.001	Real Property Asset Management Upgrade or Replace		(80,712)	(5,678)		
	D.0002299.003	Upgrade Facility Control System Application			(98,455)	(58)	
	D.0002320.012	VDI Refresh		(83,140)	(578)		
	D.0002331.001	Field Mobile GIS Upgrade				(12,061)	
	D.0002331.014	Field Mobile GIS Upgrade				(178,625)	
	D.0002338.003	Transform Operational Reporting				(90,586)	
	D.0002350.007	SAS BookRunner Upgrade				(71,898)	
	D.0002354.011	LFCM - End User Services			(15,585)		
	D.0002402.007	iSeries Software Functionality		(30,866)	1,300		
	D.0002445.001	Powerplan Upgrade		(90,844)	230		
	D.0002450.003	Multi-State Customer Refund Engine			0		
	D.0002451.003	Worktool Consolidation					(94)
	D.0002454.001	FARR replacement			(136,122)	(234)	
	D.0002456.001	Distribution and Gas Capital Planning			0		
	D.0002458.003	ARCS Replacement					(28,826)
	D.0002459.001	SharePoint Architecture Alignment				(46,595)	
	D.0002462.011	MV90xi to IEE Conversion			(32,042)	(176)	
	D.0002473.009	Exemption Certificate Management			(15,371)	(11)	
	D.0002492.007	Employee Digital Experience Intranet Platform		(93,448)	4,772		
	D.0002492.014	Employee Digital Experience Intranet Platform			(9,090)		
	D.0002520.009	Energy Demand and Load Forecasting		(181,339)	(1,135)		
	D.0002523.005	OT Asset Management - Enterprise Field Device Management Solutio					(274,665)
	D.0002523.013	OT Asset Management - Enterprise Field Device Management Solutio					(6,067)
	D.0002537.003	SAP Integration Service Platform		(212,498)	(21,894)		
	D.0002545.005	Software Asset Management Phase 2		(11,217)	(51)		
	D.0000189.001	Enterprise Weather Data Unification				(11,296)	
	D.0001958.001	Upgrade UI Planner Platform				(35,716)	
	D.0001994.121	SW License Renewals - Infrastructure			(341,192)		
	D.0002020.092	SAP Continuous Improvements Placeholder			(17,673)	(19)	
	D.0002011.008	WAN NSPMN	(2,568)			690	
	D.0002011.011	WAN NSPMN	(59,408)				
	D.0002020.049	SAP Continuous Improvements Placeholder	(7,468)			2,140	
	D.0002082.015	Video Conferencing Enablement	(19,458)	(1,182)		309	
	D.0002083.005	Windows Server OS Refresh	(1,077)				
	D.0002106.005	VoIP Refresh	(3,136)				
	D.0002125.005	DR Technology Refresh	(2,049)			11,568	
	D.0002125.009	DR Technology Refresh	2				
	D.0002125.013	DR Technology Refresh	(4,867)			433	
	D.0002125.017	DR Technology Refresh	(2,275)			1,037	
	D.0002137.006	CRS Tech Stack Upgrade	(150,548)	(738)		7,640	
	D.0002169.007	Teradata-Hadoop HW Purchase	(0)				
	D.0002210.016	2020 IT INFS Network Refresh				(23)	
	D.0002210.020	2020 IT INFS Network Refresh	(5,931)				
	D.0002212.005	2020 Planned Server Refresh				1,176	
	D.0002213.001	2020 Storage Project	(11)				
	D.0002225.009	Data Center Refresh	(24)				
	D.0002282.007	Mainframe Modernization	(39,922)	(43,359)		1,509	
	D.0002308.008	Bentley OpenUtilities Designer (BUD) Upgrade	(14,016)			1,113	
	D.0002320.018	VDI Refresh		(149,865)		449	
	D.0002340.008	Oracle Exadata Refresh				201	
	D.0002370.003	F5 Renewal	(3,943)			536	
	D.0002373.001	Motorola LMR Core Upgrade		(122,759)			
	D.0002376.001	Infrastructure Modernization	(3,725)				
	D.0002376.004	Infrastructure Modernization	(90,379)	(275)			
	D.0002376.023	Infrastructure Modernization	0				
	D.0002401.001	Aclara Upgrade	(8,114)			30	
	D.0002485.005	LFCM - Network Services	(181,688)	(359,054)		7,041	
	D.0002485.021	LFCM - Network Services	(124,481)	(2,205)		65	
	D.0002517.001	SD-WAN Implementation	(92,337)	(12,027)			
	D.0001796.011	Smallworld LNI-PNI		29			
	D.0001805.013	Next Generation Desktop	263	191			
	D.0001850.001	Network Security Orchestrator	(251,175)	(9,288)			
	D.0002020.025	SAP Continuous Improvements Placeholder	(3,648)				
	D.0002020.031	SAP Continuous Improvements Placeholder	(13,946)				

Sum of MN Allocated Major Category	Project ID	Testimony Name	Activity Year 2022	2023	2024	2025	2026
	D.0002020.039	SAP Continuous Improvements Placeholder	(146)				
	D.0002020.043	SAP Continuous Improvements Placeholder	(13,321)	(46)			
	D.0002032.006	Cash Management System Replacement	(118,401)				
	D.0002041.001	eGRC Phase IV - SOx and Corp Compliance	(419)				
	D.0002041.013	eGRC Phase IV - SOx and Corp Compliance	(20)				
	D.0002085.005	2017 Landworks Refresh	(39,105)	(766)			
	D.0002133.006	Business Objects - Refresh	(2,127)				
	D.0002137.010	CRS Tech Stack Upgrade	(422,964)	(11,364)			
	D.0002153.005	Technology License	(5,162)			325	
	D.0002308.001	Bentley OpenUtilities Designer (BUD) Upgrade	(316,320)	(2,261)			
	D.0002329.003	Upgrade Corporate Financial Model (CFM)	(1,451)				
	D.0002340.001	Oracle Exadata Refresh	(147,936)				
	D.0002366.003	ServiceNow	(1,926)				
	D.0002378.003	O365 Email Legal Hold	(41,089)	(1,701)			
	D.0002386.007	Ansible Automation and Licensing	(150,139)				
	D.0002402.003	iSeries Software Functionality	(53,842)	(1,600)	(10)		
	D.0002409.003	Integration Resiliency	(44,230)				
	D.0002409.007	Integration Resiliency	(39,766)	(2,130)			
	D.0002485.015	LFCM - Network Services	(20,425)	(2,623)			
	D.0002517.005	SD-WAN Implementation	(130,577)	(16,503)			
	D.0001804.399	Wireless Project	70				
	D.0001840.035	VoIP Refresh 2017-2020		1,553			
	D.0001850.007	Network Security Orchestrator		(260)			
	D.0002011.016	WAN NSPMN	(13,517)	114			
	D.0002082.019	Video Conferencing Enablement	(74,418)	(30,945)		520	
	D.0002125.035	DR Technology Refresh	(160,237)	(19,308)			
	D.0002356.011	LFCM - Network Services		(25,955)			
	D.0002373.016	Motorola LMR Core Upgrade	(1)				
	D.0002376.043	Infrastructure Modernization		0			
	D.0002376.045	Infrastructure Modernization	(13,853)	(2,290)			
	D.0002376.047	Infrastructure Modernization	(30,563)				
	D.0001744.016	IrthNet Damage Prevention Project		(116)			
	D.0001804.390	eSOMS Project	233	(106)			
	D.0001805.001	Next Generation Desktop	(277)	2,142			
	D.0001826.188	Demand Response Management System Replacement PROJECT	2	(3)			
	D.0001826.363	Microsoft Core Server Licensing	(40)				
	D.0001977.003	Automation Capability Enablement (ACE)	(22,538)	(636)			
	D.0002003.001	2017 Oracle Licenses	(996)				
	D.0002003.007	2018 Oracle License	(1,387)				
	D.0002020.051	SAP Continuous Improvements Placeholder	(87,794)	(23,012)			
	D.0002020.057	SAP Continuous Improvements Placeholder		(2)			
	D.0002072.001	Replace Meeting Planner	(1)				
	D.0002143.001	Technology License 2019	(676)				
	D.0002153.011	Technology License	(132,727)	(5,704)			
	D.0002153.017	Technology License	(372,086)	(107)			
	D.0002265.001	2020 Oracle Licenses	(2,804)				
	D.0002376.015	Infrastructure Modernization	(7,861)				
	D.0002376.031	Infrastructure Modernization	(4)				
	D.0002376.037	Infrastructure Modernization	(4)				
	D.0002409.015	Integration Resiliency	(6,007)				
	D.0002469.003	BI Environment refresh	(4,622)	(64)			
	D.0002469.007	BI Environment refresh		(6,788)			
	D.0002469.011	BI Environment refresh	(6,351)	(0)			
	D.0002501.005	Data Loss Prevention		(42,814)			
	D.0002532.003	Geospatial Data Lake	(106,123)	12,504			
	D.0002011.020	WAN NSPMN				(1,626)	
	D.0002541.001	AMI Headend-Exadata Storage		(74,210)			
	D.0002545.001	Software Asset Management Phase 2		(0)			
	D.0000030.002	ARCOS Renewal		(70,755)			
	D.0001943.003	BlueBeam Upgrade		(13,012)			
	D.0001994.029	SW License Renewals - Infrastructure		(182,595)			
	D.0001994.063	SW License Renewals - Infrastructure		(867,298)			
	D.0002066.001	Business Objects Refresh		339			
	D.0002557.002	Utilisphere 5 Year Enterprise License Agreement		(115,519)			
	D.0000184.002	Plant PI Refresh - Thermal and Renewable				(0)	
	D.0000093.004	Upgrade PowerPlan 2025					(131,347)
	D.0000107.004	Transmission Scheduling and Dispatch				(50,515)	
	D.0000184.001	Plant PI Refresh - Thermal and Renewable					(80,980)
	D.0000185.001	Datawarehouse Modernization and Optimization				(0)	
	D.0002320.024	VDI Refresh					(0)
	D.0002052.001	Gas Transaction System				25,678	
	D.0002301.001	Gas Plant SCADA Replacement	(1,835,865)	(26,752)			
	D.0002301.002	Gas Plant SCADA Replacement	(381,163)	(21,597)			
	D.0002301.003	Gas Plant SCADA Replacement	(296,609)	(21,597)			
	D.0002301.016	Gas Plant SCADA Replacement			(370,249)		
	D.0002301.017	Gas Plant SCADA Replacement			(87,456)		
	D.0002301.018	Gas Plant SCADA Replacement			(126,393)		
	D.0002301.008	Gas Plant SCADA Replacement	(6,503,411)	(972,733)			
	D.0002301.012	Gas Plant SCADA Replacement			(3,145,012)	(68,022)	
	D.0001815.047	MAOP Calculations for Gas System Project		23			
	D.0002020.095	SAP Continuous Improvements Placeholder				(113,583)	
	D.0002021.065	Facility IT Investments					(3,659)
	D.0002021.068	Facility IT Investments					(2,245)
	D.0002021.069	Facility IT Investments					(29,091)

Sum of MN Allocated			Activity Year				
Major Category	Project ID	Testimony Name	2022	2023	2024	2025	2026
	D.0002125.046	DR Technology Refresh				(156,361)	
	D.0002125.054	DR Technology Refresh				(91,350)	
	D.0002153.039	Technology License			(75,775)		
	D.0002106.014	VoIP Refresh	(1,145,303)	(59,088)	(7,140)		
	D.0002338.011	Transform Operational Reporting				(68,361)	
	D.0001944.008	Handheld Mobile Collector Refresh				(6,686)	
	D.0000179.001	Crew Callout Solution				(0)	
	D.0002485.057	LFCM - Network Services				(20,769)	
	D.0002488.013	LFCM - OT Modernization				(2,422)	
	D.0001974.006	CIM Tool Cloud-Hosting and JANA Connect Upgrades				(298,714)	
	D.0001958.006	Upgrade UI Planner Platform				(17,074)	
	D.0001958.012	Upgrade UI Planner Platform				(8,415)	
	D.0001936.012	Corporate Expense Mgmt System Upgrade or Replace				(57,607)	
	D.0001801.001	Gas SCADA Replacement Project		323		1,512	
	D.0001938.004	Enterprise Gas SCADA Upgrade Project				(140,165)	
	D.0001938.002	Enterprise Gas SCADA Upgrade Project				(1,184,735)	
	D.0001987.007	Gas Transaction System (GTS) - Measurement				(484)	
	D.0002547.003	Aspen HYSYS Modeling Software		(35,915)			
	D.0000071.010	Informatica Lifecycle Management (ILM) Replacement					(75,305)
	D.0000166.012	OT Shared Services Platform			(14,298)	(290)	
	D.0000202.004	F5 Distributed Platform				(219,527)	
	D.0001945.003	FCS Upgrade 3				(427)	
	D.0001990.092	SW License Renewals - App Del			(94,164)		
	D.0001990.103	SW License Renewals - App Del				(25,544)	
	D.0001994.104	SW License Renewals - Infrastructure	(6,888)				
	D.0001994.106	SW License Renewals - Infrastructure	(12,185)				
	D.0001994.126	SW License Renewals - Infrastructure	(68,324)				
	D.0001994.134	SW License Renewals - Infrastructure	(24,659)				
	D.0001994.136	SW License Renewals - Infrastructure	(6,623)				
	D.0001994.141	SW License Renewals - Infrastructure	(49,621)				
	D.0001994.151	SW License Renewals - Infrastructure	(32,961)				
	D.0001994.156	SW License Renewals - Infrastructure	(30,172)				
	D.0001994.169	SW License Renewals - Infrastructure				(29,140)	
	D.0001994.182	SW License Renewals - Infrastructure				(67,547)	
	D.0002223.020	Customer Care IVR Upgrades				(8,345)	
	D.0000075.005	Gas Contractor Quality Work Inspection Program Document Software	(67,888)				
	D.0001990.085	SW License Renewals - App Del	(299,531)				
	D.0001990.097	SW License Renewals - App Del	(235,228)				
	D.0000149.011	Oracle Major Upgrade				(2,881)	
	D.0000184.009	Plant PI Refresh - Thermal and Renewable				(422)	
	D.0000209.004	OT Network Sensor Program				(171,716)	(0)
	D.0000219.001	LFCM - End User Services				(11,228)	(49,264)
	D.0000219.005	LFCM - End User Services				(11,685)	(49,264)
	D.0000219.012	LFCM - End User Services				(11,045)	(49,264)
	D.0000219.016	LFCM - End User Services				(20,776)	(49,264)
	D.0000219.020	LFCM - End User Services				(12,755)	(49,289)
	D.0000219.024	LFCM - End User Services				(21,069)	(49,264)
	D.0000219.031	LFCM - End User Services				(2,350)	(49,264)
	D.0000220.002	LFCM - Data Center				(88,215)	(87,133)
	D.0000220.005	LFCM - Data Center				(67)	
	D.0000220.009	LFCM - Data Center				(6,555)	
	D.0000220.013	LFCM - Data Center				(41,921)	(323,019)
	D.0000221.001	LFCM - End User Services				(34,316)	(16,421)
	D.0000221.006	LFCM - End User Services				(979)	(16,421)
	D.0000221.011	LFCM - End User Services				(2,361)	(16,421)
	D.0000221.016	LFCM - End User Services				(19,507)	(16,421)
	D.0000221.021	LFCM - End User Services				(1,530)	(16,421)
	D.0000221.028	LFCM - End User Services				(41,114)	(16,422)
	D.0000221.032	LFCM - End User Services				(5,195)	(16,421)
	D.0000149.008	Oracle Major Upgrade				(40,257)	(21,422)
	D.0000168.001	Xcelebrate Replacement				(8,129)	
	D.0000202.007	F5 Distributed Platform				(343)	
	D.0000207.002	PowerBase - Relay Testing System (RTS) Upgrade				(0)	
	D.0000218.001	iManage Renewal and Upgrade				(28,290)	
	D.0000220.017	LFCM - Data Center				(18,529)	
	D.0000224.004	Audit Management Software				(11,160)	
	D.0000292.002	Tririga Platform Upgrade				(44)	
	D.0001988.029	Archer Enhancements					(64,369)
	D.0001990.099	SW License Renewals - App Del				(35,702)	(78,401)
	D.0001994.161	SW License Renewals - Infrastructure				(17,461)	
	D.0001994.165	SW License Renewals - Infrastructure				(31,218)	
	D.0001994.185	SW License Renewals - Infrastructure				(142,102)	
	D.0001994.198	SW License Renewals - Infrastructure				(24,476)	
	D.0001994.203	SW License Renewals - Infrastructure				(25,334)	
	D.0002222.015	CIS Modernization				(78,916)	
	D.0002223.025	Customer Care IVR Upgrades				(0)	
	D.0000298.004	Underground Gas Storage					(392,865)
	D.0001987.003	Gas Transaction System (GTS) - Measurement				(94,569)	
	D.0000258.001	Primavera (P6) Upgrade					(308,726)
	D.0000260.001	Fleet Asset Upgrade 2026					(38,722)
	D.0000321.003	Integrated Risk Assessment System (IRAS) Replacement					(915,119)
	D.0002124.005	Gas Transmission Risk (GTR) Calc	(222,854)				
	D.0002301.010	Gas Plant SCADA Replacement	(14,509)				
	D.0002301.011	Gas Plant SCADA Replacement	(11,624)				

Sum of MN Allocated			Activity Year				
Major Category	Project ID	Testimony Name	2022	2023	2024	2025	2026
Aging Technology Total			**(15,705,157)**	**(11,474,767)**	**(10,934,212)**	**(7,392,563)**	**(5,015,025)**
Customer	**D.0000029.004**	My Account Digital Services Platform Enhancements			(778,497)	(4,702)	
	D.0001924.017	Energy and Utilities Cloud		(412,987)	(25,774)		
	D.0002037.022	Customer Service Console - Single Screen			0		
	D.0002247.009	MyAccount and Mobile App Enhancements	(99,475)	(163,952)	3,607	(5)	
	D.0002249.013	Text To Pay				(3,708)	
	D.0002389.003	Agent Console		(404,289)	(65,731)		
	D.0002390.001	Billing and Payments			(0)		
	D.0002522.003	Business Portal				(62)	
	D.0002209.015	2020 Handheld Mobile Collector Refresh	(11,535)	17			
	D.0002199.003	Voice Agent Project Idea	(47)				
	D.0002209.009	2020 Handheld Mobile Collector Refresh	(24,829)	(0)			
	D.0002247.003	My Account	(944,901)	155			
	D.0002248.003	XE.COM	(483,344)	526			
	D.0002249.003	Mobile App	(625,044)	1,337			
	D.0002250.003	Customer API Ph 1	(35,337)	550			
	D.0002250.011	Customer API Ph 2	(456,400)	(3,111)			
	D.0002251.003	Customer Data	(5,741)	518			
	D.0002251.007	Customer Data Ph 2	(377,712)	20			
	D.0002253.003	CIAM	(323,736)				
	D.0002253.007	Customer Identity Access Management		(15)			
	D.0002273.003	Builder's Call	(9,190)				
	D.0002273.007	NCC Ph 2	(37,209)				
	D.0002300.009	Enterprise Purge Archive	(41,001)	355			
	D.0002391.001	N:/IVR		(0)			
	D.0002392.001	Notifications		(1)			
	D.0002393.001	Outages		(3)			
	D.0001792.149	Enhanced Customer Outage Experience(aka XE.com Remediation)		48			
	D.0002255.003	Contact Center	2				
	D.0002256.003	Analytics, AI, and NLU	2				
	D.0000172.002	Agent Deployment Forecasting Tool			(11,267)		
	D.0000173.001	Propensity to Pay Model Enhancement			(11,267)		
	D.0000174.001	Disconnections Routing Tool			(17,706)		
	D.0001924.013	Customer Experience Transformation Phase 3				(0)	
Customer Total			**(3,475,498)**	**(980,833)**	**(906,635)**	**(8,478)**	
Cyber Security	**D.0000008.002**	RSA SecurID OT Upgrade			(19,571)		
	D.0000020.012	Industrial Defender Splunk			(66,936)	9,583	
	D.0001896.001	FireEye IDS-IPS			(88,757)	(67)	
	D.0001896.012	FireEye IDS-IPS			(47,390)	(2,912)	
	D.0001897.001	Red Team Program Development		(1,884)	1,943		
	D.0002206.007	Security Services Upgrade			(2,924)		
	D.0002315.005	Multi-Factor Authentication - maturation				(7)	
	D.0002384.003	Analog Security Camera Upgrade	(49,136)	(82,820)	(47,262)	(109,465)	(43,892)
	D.0002416.001	Verint Security Camera Server Replacement		(106,698)	(1,621)	931	
	D.0002554.001	CyberArk Hardware Upgrade		(7,833)	(29)	(194)	
	D.0002371.003	OT Security Lab				(116,261)	
	D.0002382.003	Axio Risk Dashboard		(73,172)	7,831		
	D.0002515.003	ITC - OT Monitoring 2021			(0)		
	D.0000006.003	Fortress Software Bill of Materials (SBOM)				(94,009)	
	D.0000009.005	SailPoint Enhancements				(105,851)	
	D.0000020.023	Industrial Defender Splunk			(68,370)	(1,365)	
	D.0000022.001	Transitioning Tanium to Saas			(120,804)		
	D.0000163.005	Security Tools and Applications Renewals			(67,492)		
	D.0001818.087	SIEM Extension			1,167		
	D.0001825.095	Advanced Endpoint Protection				(370)	
	D.0001845.003	PingFed to Azure SSO Migration		(98,674)	(2,259)		
	D.0001896.008	FireEye IDS-IPS			(59,638)	(11,615)	
	D.0001897.010	Red Team Program Development		(13,631)	(35,724)		
	D.0001991.010	Unix and Linux Access Control			(77,629)	(2)	
	D.0001993.003	Incident Management Hub					(118,802)
	D.0002410.003	Terrain Analytics		(173)	15		
	D.0002410.007	Terrain Analytics			(125,218)		
	D.0002413.008	SailPoint 2021	(100,585)	(50,111)	0		
	D.0002417.001	Reprivata monitoring sensors		(88,175)	(1,501)		
	D.0002418.015	SIEM+SOAR			(27,766)		
	D.0002419.001	Risk and Compliance Tool Buildout				(53,130)	
	D.0002486.001	Service Account Remediation			(173,768)	264	
	D.0002556.010	SailPoint Onboard Applications			(127,062)	1,566	
	D.0000163.015	Security Tools and Applications Renewals			(13,063)		
	D.0001840.130	Security Camera Upgrade		537			
	D.0001771.014	Certificate & Key Management	(124,013)	(1,476)			
	D.0002008.019	Enterprise Database Security Phase II	158				
	D.0002098.014	Cyber Ark (Support and Services Account)	2,309				
	D.0002206.003	Security Services Upgrade		(75,270)			
	D.0002269.017	OT Shared Services	(2,140)				
	D.0002276.001	Documentum 16.4 Upgrade	(70,636)	(712)			
	D.0002312.001	SailPoint Phase 5	(43)				
	D.0002347.003	Risk Assessment as a Service	(75,194)	216			
	D.0002411.003	Deception Servers	(91,621)				
	D.0002413.003	SailPoint 2021	(494,502)	(2,032)			
	D.0002414.007	Multi-Factor Authentication - Maturation Phase 2	(888)				
	D.0002415.007	Socially-Engineered Attack Prevention	(2,617)				
	D.0002418.001	SIEM+SOAR	(340,082)				
	D.0002413.014	SailPoint 2021	(6,521)				

Sum of MN Allocated			Activity Year				
Major Category	**Project ID**	**Testimony Name**	**2022**	**2023**	**2024**	**2025**	**2026**
	D.0002417.007	Reprivata monitoring sensors		(2,387)			
	D.0001771.004	Certificate & Key Management		2,289		268	
	D.0001898.001	Endpoint Detection and Response		(179,116)	(5)		
	D.0001914.003	Tanium Enforce and PWC Accelerators	(58,126)	8,771			
	D.0002098.001	Cyber Ark (Support and Services Account)	18	(12)		17	
	D.0002418.007	SIEM+SOAR	(11,696)	(10,730)			
	D.0000131.001	Secondary Emergency Operations Center				(0)	
	D.0000121.004	Machine Learning (ML) Visualization Tools					(0)
	D.0000122.004	Lightweight Directory Access Protocol (LDAP) Authentication Services					(0)
	D.0000123.004	Cloud Vulnerability Scanning					(218,976)
	D.0000135.004	IT Splunk Security Orchestration and Automated Response (SOAR)					(0)
	D.0000136.004	IT SailPoint - CyberArk Integration					(53,433)
	D.0000152.001	Domain Rationalization					(49,704)
	D.0000153.003	Splunk Automation Enhancement				(0)	
	D.0000156.001	Cloud Security Governance					(26,001)
	D.0000159.001	Integrated physical security				(27,811)	
	D.0000160.003	SailPoint Role-Based Access Control				(16,026)	
	D.0001991.003	Unix and Linux Access Control			99		
	D.0000163.020	Security Tools and Applications Renewals			(315,879)	16,917	
	D.0000163.028	Security Tools and Applications Renewals			(5,786)		
	D.0000163.031	Security Tools and Applications Renewals			(258,591)		
	D.0000163.042	Security Tools and Applications Renewals			(16,869)		
	D.0000163.047	Security Tools and Applications Renewals				(10,038)	
	D.0000163.054	Security Tools and Applications Renewals				(25,925)	
	D.0000163.055	Security Tools and Applications Renewals				(267,918)	
	D.0000193.003	Email Security Tool	(80,389)			(1,517)	
	D.0000193.010	Email Security Tool				(15,250)	
	D.0000200.001	IT Splunk Strider Enhancements				(52,216)	
	D.0000214.001	Business Continuity Platform Overhaul				(178)	
	D.0000215.005	Private Key and Certificate Enhancements				(13,614)	
	D.0002553.010	Data Scientist Tools				(34,225)	
	D.0000005.002	Upgrade to Forensic Capability				(0)	
	D.0000005.011	Upgrade to Forensic Capability				(1,996)	
	D.0000009.007	SailPoint Enhancements				(55)	
	D.0000159.005	Integrated physical security				(1,295)	
	D.0000212.001	OT Full Packet Capture					(188,334)
	D.0000308.001	Electronic Key Validator Replacement				(0)	
	D.0002553.001	Data Scientist Tools				(53)	
	D.0000154.008	IT Splunk Security Information and Event Management (SIEM)					(81)
	D.0000160.009	SailPoint Role-Based Access Control				(15,718)	
	D.0000161.004	Identity Governance Administration (IGA) App Sailpoint Onboarding				(0)	
	D.0000163.035	Security Tools and Applications Renewals				(8,137)	
	D.0000163.058	Security Tools and Applications Renewals				(734)	
	D.0000163.066	Security Tools and Applications Renewals				(2,259)	
	D.0000163.070	Security Tools and Applications Renewals				(245,786)	
	D.0000163.074	Security Tools and Applications Renewals				(120,715)	
	D.0000163.079	Security Tools and Applications Renewals				(22,110)	
	D.0000163.086	Security Tools and Applications Renewals				(5,441)	
	D.0000163.099	Security Tools and Applications Renewals				(3,970)	
	D.0000296.005	OT SIEM Enhancements					(15)
	D.0001992.008	B2B Management				(16,515)	
	D.0001992.014	B2B Management				(17,863)	
	D.0000262.005	OT Full Packet Capture					(23,571)
	D.0001993.008	Incident Management Hub					(0)
	D.0000154.001	IT Splunk Security Information and Event Management (SIEM)					(0)
	D.0000157.002	Secrets Management					(0)
	D.0000243.004	OT Situational Awareness & Event Management					(102,623)
	D.0000254.001	OT EDR					(58,622)
	D.0000262.001	OT Full Packet Capture					(59,521)
Cyber Security Total			**(1,425,314)**	**(783,093)**	**(1,841,248)**	**(1,393,064)**	**(943,575)**
Emergent Demand	**D.0000199.001**	IT Blanket - Infrastructure					(58,522)
	D.0000196.001	IT Blanket - Data and Analytics				(8,146)	(17,497)
	D.0000195.001	IT Blanket - Customer					(35,406)
	D.0000197.001	IT Blanket - Operations					(76,809)
Emergent Demand Total						**(8,146)**	**(188,234)**
Enhance Capabilities	**D.0001899.001**	MAC Support Enablement			0		
	D.0001913.001	Field Technology Re-platform			0		
	D.0001916.003	Private LTE		(30,794)	(124,217)	(260,416)	(561,839)
	D.0001916.023	Private LTE				(42,256)	
	D.0001916.025	Private LTE				(49,174)	
	D.0001916.036	Private LTE				(44,144)	
	D.0002181.005	Strategic Fiber Deployment		(1,455,341)	(41,559)	1,253	
	D.0002465.002	Field Modem Management		27	(29)		
	D.0002535.001	Cyber-Recovery Solution			(8,520)	(721)	
	D.0002551.018	ESRI ADR to Capital			(5,099)		
	D.0002254.028	RPA Release		(99,036)	(5,879)	(1,257)	
	D.0002254.034	RPA Release			(111,506)	(1,438)	
	D.0002363.032	Data Science Models Phs2		(60,184)	1,831		
	D.0002363.036	Data Science - Cust 2023			(10,185)	(227)	
	D.0002363.045	Enterprise Data Analytics			(21,849)	(5,734)	
	D.0002363.048	Data Science - Cust 2024			(5,065)	(789)	
	D.0002383.003	Distributed Intelligence				(16,022)	
	D.0000007.002	Enterprise Corrective Action Program				(0)	
	D.0000012.005	Business Objects Enhancements				(11,607)	

Sum of MN Allocated			Activity Year				
Major Category	Project ID	Testimony Name	2022	2023	2024	2025	2026
	D.0000014.006	Meter Data Enhancements				(166,585)	
	D.0000017.011	Billing and Payment Enhancements				(195,064)	
	D.0000017.021	Billing and Payment Enhancements				(53,378)	
	D.0000017.022	Billing and Payment Enhancements				(3,086)	
	D.0000018.007	Data Mart Builds		(20,356)	(16,101)		
	D.0000018.012	Data Mart Builds			(47,809)	(19,960)	
	D.0000024.005	OSI PI Enhancements			(22,162)	(1,789)	
	D.0000024.011	OSI PI Enhancements			(9,378)		
	D.0000067.005	Flutter Native Mobile App			(259,115)	(45,939)	
	D.0000085.006	SAP Integration Service Platform Phase 2			(79,134)	(581)	
	D.0000111.004	Core Digital Channel Enhancements Phase 2				(75,810)	
	D.0000165.005	End to End Work Management System				(303,336)	
	D.0001895.039	SAP ADR to Capital		(30,371)	(2,424)		
	D.0001916.011	Private LTE			(246,709)	(31,782)	
	D.0001955.009	HCM Enhancements		(261,406)	(79,319)	(3)	
	D.0001955.018	HCM Enhancements				(71,089)	
	D.0001968.007	Network Transport Enhancements	(1,500)	(3,507)	4,424		
	D.0002298.023	Unmanned Aircraft Systems Program			(26,846)	5	
	D.0002298.029	Unmanned Aircraft Systems Program			(83,856)		
	D.0002298.035	Unmanned Aircraft Systems Program			(1)		
	D.0002298.041	Unmanned Aircraft Systems Program			(6,779)		
	D.0002395.007	Digital Ops Factory	(148,459)		675		
	D.0002396.049	FERC Cost Traceability Process Improvement	58,038		104,437	271,336	
	D.0002427.016	Energy Supply APM Phase 2		(88,971)	(9,950)		
	D.0002430.016	Real Time Scheduling Engine			(271,715)	(9)	
	D.0002438.007	Unified Data Platform		(16,319)	15	770	
	D.0002438.013	Unified Data Platform			(211,195)	(2,368)	
	D.0002446.001	Supply Chain Procure to Pay				(0)	
	D.0002446.005	Supply Chain Procure to Pay				(564,758)	
	D.0002446.024	Supply Chain Procure to Pay			(70,923)		
	D.0002496.003	Kafka Expansion		(45,817)	(1,134)		
	D.0002512.001	ServiceNow Enhancements	(215,290)	(97,962)	(8,521)		
	D.0002512.023	ServiceNow Enhancements			(57,082)		
	D.0002512.029	ServiceNow Enhancements			(61,721)	(20,448)	
	D.0002514.007	APM Phase 3			(80,462)	(384)	
	D.0002514.011	APM Phase 3				(252,043)	
	D.0002521.003	Application Maturity Model		(46,493)	(230)		
	D.0002535.005	Cyber-Recovery Solution			(128,152)	238	
	D.0002546.003	Strategic Portfolio Management (SPM) in ServiceNow			(149,182)	(5,983)	
	D.0002549.003	Smallworld ADR to Capital		(9,542)	21		
	D.0002549.011	Smallworld ADR to Capital		(18,390)	(915)		
	D.0002549.019	Smallworld ADR to Capital			(12,856)	(23)	
	D.0002549.021	Smallworld ADR to Capital			(15,446)	(850)	
	D.0002551.003	ESRI ADR to Capital		(7,710)	(446)		
	D.0002551.007	ESRI ADR to Capital		(4,812)	(680)		
	D.0002551.021	ESRI ADR to Capital			(22,152)	(1,890)	
	D.0000073.011	Pay Arrangements				(231,203)	
	D.0000133.004	SAP Warehouse Management					(65,918)
	D.0000133.008	SAP Warehouse				(7)	
	D.0000133.011	SAP Warehouse Management					(44,136)
	D.0000176.004	Integrated Systems Planning - Unified Data Platform Enabled Load Fo				(210,207)	
	D.0002438.021	Unified Data Platform				(14,117)	
	D.0002283.001	Avaya Cloud Voice Deployment	(1,525)				
	D.0002429.001	Return to Office Remediation	(12,550)			3,360	
	D.0001833.003	SAP Solution Manager Cap		0			
	D.0002045.012	Enterprise Operational Monitoring	(581)			2,220	
	D.0002073.006	Safety Observations & Predictive Analytics	(149)				
	D.0002074.006	Enterprise Data Management Tool		(235,509)			
	D.0002113.006	Purchase Power Agreement Contract Management	(1,473)				
	D.0002254.018	RPA Release	(6,153)				
	D.0002277.003	Crew Time Entry App	(79)	(32)			
	D.0002277.013	EXT Time Entry App		(5,502)			
	D.0002283.009	Avaya Cloud Voice Deployment	(3,676)				
	D.0002298.010	Unmanned Aircraft Systems Program	(107,239)	(12,338)			
	D.0002298.016	Unmanned Aircraft Systems Program	(89,761)				
	D.0002322.003	Outage Employee Experience	12,426	21			
	D.0002363.013	Res Data Science Models	(17,387)				
	D.0002367.001	Kafka Data Streaming	(2,916)				
	D.0002380.003	Fleet Capital Asset Management (CAM)	(23,178)				
	D.0002399.019	QR Code		(858)			
	D.0002429.015	Return to Office Remediation	(2,930)				
	D.0002429.021	Return to Office Remediation	(152)				
	D.0002254.023	RPA Release	(116,031)	(2,452)			
	D.0001796.031	Network Inventory and Planning Solution	(1)	11			
	D.0001839.183	Mobile Computing Infrastructure	(40)	32			
	D.0001839.625	ESB Environment Refresh		61			
	D.0001895.005	SAP ADR to Capital		(5,331)			
	D.0001895.009	SAP ADR to Capital	(5,658)	(2,342)			
	D.0001895.013	SAP ADR to Capital	(20,058)	(7,234)			
	D.0001895.019	SAP ADR to Capital	(16,964)	(7,897)			
	D.0001895.023	SAP ADR to Capital		(18,948)			
	D.0001916.019	Private LTE		(2,553,219)			
	D.0001946.005	Network App Services Enhancements	(7,062)	(1,090)			
	D.0001948.005	Route and Switch Enhancements	(51,000)	(1,438)			

Sum of MN Allocated			Activity Year				
Major Category	Project ID	Testimony Name	2022	2023	2024	2025	2026
	D.0002100.011	Basic Private Cloud Services		297			
	D.0002185.003	Network Automation Platform Implementation	315	(204)			
	D.0002364.003	Business Systems Resiliency Project	(134)	(1)			
	D.0002430.003	Real Time Scheduling Engine	(647,345)	(51,405)			
	D.0002465.003	Field Modem Management		(1,032)			
	D.0002466.001	eSOMS Upgrade	(46,760)	(3,515)			
	D.0002512.019	ServiceNow Enhancements		(10,260)			
	D.0001839.388	SharePoint 2013 Phase II Project		344			
	D.0002512.011	ServiceNow Enhancements		(18,049)			
	D.0000130.005	Integrate Physical and Logical Access					(0)
	D.0000096.002	Native Mobile App Advanced Usage Insights and Programs				(87,603)	
	D.0000097.004	Core Digital Channel Enhancements Phase 3				(55,283)	
	D.0000140.004	SharePoint Enhacements				(14,748)	
	D.0000181.001	MDO Supply Chain Implementation					(9,058)
	D.0000188.001	Machine Learning Image Labeling Tools				(1,932)	
	D.0000191.001	SAP S4 HANA Data Availability				(0)	
	D.0001916.041	Private LTE				(438,926)	
	D.0000114.004	Sustainability-Environment, Social, and Governance (ESG) Data Hub					(0)
	D.0002438.025	Unified Data Platform			(10,944)		
	D.0002438.037	Unified Data Platform				(31,943)	
	D.0002438.044	Unified Data Platform				(165,845)	
	D.0002463.012	Account Reconciliation					(22,313)
	D.0002512.039	ServiceNow Enhancements			(20,672)	14,965	
	D.0002512.043	ServiceNow Enhancements				(43,514)	
	D.0002512.048	ServiceNow Enhancements				(150,672)	
	D.0002512.054	ServiceNow Enhancements				(275,273)	
	D.0002512.059	ServiceNow Enhancements				(359,044)	
	D.0002512.072	ServiceNow Enhancements				(105,942)	
	D.0002512.079	ServiceNow Enhancements				(6,941)	
	D.0002512.087	ServiceNow Enhancements				(18,225)	
	D.0002512.090	ServiceNow Enhancements				(36,408)	
	D.0002277.009	ITC-Gas Response App NSPM				(102,087)	
	D.0002363.029	Dist/Gas Data Science Phs2 NSPM				(201,565)	
	D.0000026.003	Gas Transmission Risk (GTR) Calc - IRAS Algorithm Update			(46,393)		
	D.0001919.003	Gas Emergency Respond - EXT	(1,031,309)	(774,899)			
	D.0002443.003	Gas Frontline Enablement and Experience	(3,115,286)	(123,935)	(1,100)	294	
	D.0002443.006	Gas Frontline Enablement and Experience		(1,440,117)	(285,030)	814	
	D.0001916.046	Private LTE				(3)	
	D.0000007.007	Enterprise Corrective Action Program				(13)	
	D.0000074.007	Core Digital Channel Enhancements Phase 1				(290,271)	
	D.0000113.007	Commercial Operations Transaction System Enhancements			(10,020)	(938)	
	D.0000171.002	Gen AI Agent Assist Tool			(17,541)	(520)	
	D.0000176.011	Integrated Systems Planning - Unified Data Platform Enabled Load Fo					(124,799)
	D.0000205.014	Property Services Scanning Operation Expansion				(12,350)	
	D.0002369.001	Blue Prism Licenses				2,198	
	D.0002551.027	ESRI ADR to Capital			(5,297)	(442)	
	D.0002551.033	ESRI ADR to Capital				(9,224)	
	D.0000086.001	Gas Frontline Enablement and Experience Phase 2			(729,292)	(60,721)	
	D.0000081.004	Rice Street Move					(69,683)
	D.0000133.017	SAP Warehouse Management				(16,359)	
	D.0000205.009	Property Services Scanning Operation Expansion				(702)	
	D.0002254.043	RPA Release				(57,130)	(16,496)
	D.0002363.068	Trans, DIst, Energy Supply 25-NSPM				(13,353)	
	D.0000018.025	Data Mart Builds				(14,483)	
	D.0000070.011	Unified Interconnection Portal				(34,212)	
	D.0000096.007	Native Mobile App Advanced Usage Insights and Programs				(81,232)	
	D.0000111.009	Core Digital Channel Enhancements Phase 2				(86,989)	
	D.0000138.009	SAP Industry Solution Utilities (ISU) Enhancements				(20,404)	
	D.0000148.001	Update Learning Central					(59,035)
	D.0000187.005	Software Asset Management In ServiceNow				(240)	
	D.0000187.012	Software Asset Management In ServiceNow				(11,568)	
	D.0000208.005	Artificial Intelligence Platform Enablement				(163,291)	
	D.0000282.004	CRS Observability				(36,922)	
	D.0001955.025	HCM Enhancements				(32,051)	
	D.0001955.037	HCM Enhancements					(22,419)
	D.0001979.013	Legal eDiscovery				(6,203)	(0)
	D.0000081.006	Rice Street Move					(21,952)
	D.0002363.073	Ops Data Science Tools: 25 Gas NSPM				(3,225)	
	D.0000018.018	Data Mart Builds				470	
	D.0000086.006	Gas Frontline Enablement and Experience Phase 2				(333,367)	
	D.0000222.012	Cathodic Protection Software Replacement				(147,860)	(13,509)
	D.0000206.001	Integrated System Planning (ISP) Computational Data Consolidation					(61,631)
	D.0000239.003	ServiceNow AI module (Now Assist)					(109,603)
	D.0000227.003	Blackline Dual Detection and Comm Devices					(566,613)
	D.0002363.006	Dist/Gas Data Science NSPM	(51,235)				
	D.0002379.003	Gas Estimation Tool (GET)	(191,117)				
Enhance Capabilities Total			**(5,864,216)**	**(7,573,826)**	**(3,331,194)**	**(5,938,575)**	**(1,769,003)**
Grand Total			**(26,470,185)**	**(20,812,519)**	**(17,013,290)**	**(14,740,826)**	**(7,915,836)**

Technology Services 2022-2026 O&M Budget by Category NSPM Gas ($s)					
Cost Element	**2022 Actuals**	**2023 Actuals**	**2024 Actual**	**2025 Actual/Forecast**	**2026 Budget**
Network Services	730,687	950,901	955,987	1,017,840	1,411,762
Software License and Maintenance	3,000,099	3,341,734	3,185,236	2,868,319	3,560,838
Company Labor	1,679,186	1,845,502	1,784,057	1,793,845	1,899,256
Application Development & Maintenance	1,163,631	624,218	654,451	543,442	622,958
Contract Labor/Consulting	973,185	640,989	634,949	849,493	1,750,284
Shared Assets	1,884,677	2,180,730	2,389,754	2,775,656	3,032,836
Hardware Maintenance	238,480	263,937	325,301	226,158	223,838
Other	234,957	146,901	155,174	147,256	164,230
Total	**9,904,901**	**9,994,912**	**10,084,909**	**10,222,008**	**12,666,002**

*There may be differences between the sum of the individual category amounts and Total amounts due to rounding.

Technology Services O&M Costs by FERC Account Minnesota-Gas ($s)					
FERC	**2022**	**2023**	**2024**	**2025**	**2026**
Account	**Actuals**	**Actuals**	**Actuals**	**Actual / Forecast**	**Test Year**
813	65,380	91,760	121,649	64,217	-
824	1	-	1	0	-
841	10	-	4,796	24,012	-
846.2	13	-	17	0	-
850	2	1,906	-	-	-
851	46,277	28,311	18,640	6,062	5,762
859	12,739	-	18	10,476	2,828
866	32	7	7	5	4
870	10,051	718	11,414	-	-
871	579,939	286,803	269,335	79,478	80,316
878	-	-5	1,587	-394	-
880	292,778	158,170	174,318	309,787	205,138
901	-	-	5	-	-
902	383,181	145,630	255,107	242,567	328,393
903	1,027,697	1,064,841	879,516	916,699	1,833,169
905	5	-	9	0	-
908	-	28	-	-	-
909	8,145	-22	-	-89	-
910	8	-	9	0	-
912	11,202	18,214	-	1,071	-
916	-	-	-	-	-
920	1,317,504	1,451,840	1,473,543	1,250,398	1,530,429
921	3,583,270	4,157,256	4,053,126	399,104	441,889
922	-2,681,060	-2,725,950	-3,721,081	-3,945,151	-3,791,729
923	640,603	378,954	389,379	612,578	726,909
925	-	-	-	1,978	-
930.1	-	2	31	77	-
930.2	7,548	184	143	465	38
931	4,599,521	4,936,265	6,153,211	42,289	53,355
935	56	-	133	138	124
935.1	-	-	-	7,141,333	7,258,132
935.2	-	-	-	2,067,247	2,592,048
935.3	-	-	-	997,688	1,399,198
Total	**9,904,901**	**9,994,912**	**10,084,913**	**10,222,036**	**12,666,002**