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Xcel Energy

Information Request No.

1

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
3. For each separate information request, please identify the individual responsible for providing the response.
4. In producing documents and written responses pursuant to these information requests, designate and restate the request and subpart thereof in response to which each document or response is produced. You may answer under the portion designated “Response.”
5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2024 Actual Expenses, the IT/Billing

expense was \$27,384. Please provide a detailed breakdown of all of the costs that went into this Actual Expense including, but not limited to: 1) a detailed description of each task that was performed; 2) the hours and cost allocated for each task; 3) the number of employees or contractors assigned to each task; 4) the job title, qualifications, and pay rate for each employee or contractor assigned to each task; and, 5) the number of hours estimated each employee or contractor is expected work on each task.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the information request (IR) as appropriate.

- 1) Attachment A to our Initial Comments included updated cost information to support the CSG participation fee. We provide a subset of that information in Table 1 below.

Table 1: Participation Fees

EXPENSES	Participation Fees					
	2024 <i>Actual</i>	2025 <i>Forecast</i>	2026 <i>Forecast</i>	2027 <i>Forecast</i>	2028 <i>Forecast</i>	2029 <i>Forecast</i>
1. Beginning Balance	\$ -	\$ 745,931	\$ 1,762,613	\$ 1,983,847	\$ 2,161,783	\$ 1,247,020
2. Participation Fees						
2a. Department of Commerce ¹	\$ 961,000	\$ 961,000	\$ 961,000	\$ 961,000	\$ 31,659	\$ 32,232
2b. Annual Marketing ²	\$ -	\$ 30,000	\$ 30,543	\$ 31,096	\$ 31,659	\$ 32,232
2c. IT/Billing Annual	\$ 27,384	\$ 250,000	\$ 203,620	\$ 210,584	\$ 217,786	\$ 225,234
2c. SalesForce Participation Fees ³	\$ 147,312	\$ 118,080	\$ 148,230	\$ 148,230	\$ 148,230	\$ 148,230
3. Subscriber Management ⁴	\$ 92,234	\$ 124,000	\$ 128,241	\$ 132,627	\$ 137,162	\$ 141,853
3. Total Expenses (Lines 1+2a+2b+2c)	\$ 1,227,931	\$ 1,483,080	\$ 1,471,634	\$ 1,483,536	\$ 534,837	\$ 547,549
RECOVERY						
4. Total Allocated MW (Legacy+AMI) ⁵	903	933	1,042	1,088	1,208	1,308
5. Participation Fee per MW ⁶	500	500	1,200	1,200	1,200	1,200
6. Total Collected (Lines 4x5) ⁷	\$ 482,000	\$ 466,398	\$ 1,250,400	\$ 1,305,600	\$ 1,449,600	\$ 1,569,600
End of Year Balance (Lines 3-6)	\$ 745,931	\$ 1,762,613	\$ 1,983,847	\$ 2,161,783	\$ 1,247,020	\$ 224,969

Regarding Information Technology spending, the Company utilizes three levels of technology support for its customer distributed generation (DG) programs and services:

- ***Basic support for existing technology functions:*** This support is provided by a general support team that works on several technology systems at a Company-wide level; this work is not charged back to programs and is not included in this summary.
- ***Escalated support requests:*** This support includes the addition of moderately complex features and functions that do not require a special long-term development team and is provided by a different dedicated DG program Salesforce support team that consists of individuals from a different external

consulting group. This program funded support team enables prioritization of functionality or performance to meet operations and reporting needs for DG programs and the interconnection process. This team's work focus excludes metering and billing technology, which is enabled and supported outside of this process. The dedicated DG program support team is shared by the Salesforce technology needs across all of the states where the Company offers DG programs and interconnection support. Costs are assigned to the appropriate program or jurisdiction on a per-project basis or using an allocation if the work benefits multiple programs or jurisdictions.

- ***Major-project development.*** This support is for projects beyond the scope of the DG program Salesforce support team that focuses on shorter-term and less complex projects. Examples of work requiring this higher level of support include creating enabling technology for a state's new interconnection rules and processes or implementing consolidated billing in a specific state for CSGs.

The table above reflects \$27,384 of actual costs for IT/Billing in 2024—this cost is the portion of the dedicated DG program Salesforce support team that was charged specifically to the MN CSG program. Throughout 2024, other states' DG programs and interconnection requirements required the bulk of the work from this DG support team, thus the Minnesota CSG program had minimal direct support charges in 2024. The \$27,384 reflects allocated costs that were charged to MN CSG program. Specifically, work was completed to update the automation code in Salesforce to enable stable performance as Salesforce modernized its automation code; the prior automation code was scheduled to retire at the end of 2024, so this work was required to be completed before that expiration to maintain interconnection and DG program technology stability and performance. The Company used an allocator to assign these costs - each state with a unique interconnection portfolio was allocated an equal portion of the costs for this project. Then, within the state's allocation, each program option was assigned its portion of cost based on quantity of customers participating in that program in 2023.

DG support team costs in the latter half of 2024 that normally would have been charged to Minnesota CSGs were limited. Efforts were made to avoid mid-stream changes to the CSG enabling technology code as other changes were being made under the Consolidated Billing project. This aimed to ensure stability during the confluence of the new and old code.

- 1) The Company provides details regarding the work performed above. A more detailed description of each task that was performed is not available without a special analysis.

2)-3) These resources are outsourced through an external company and this level of specificity is not a level of detail the Company shares with external parties as this information is confidential to a third-party and we have a contractual obligation to protect this information. Therefore, the unique individual, hourly rate and other details as requested are not available in response to this IR.

4) The Company objects to providing specific employee or consulting resource information as being overly burdensome, unreasonably broad, and falling within the scope of information that we have a contractual duty to protect.

5) The number of hours estimated each employee, or contractor is expected work on each task is not available without a special analysis.

Preparer: Ryan Bruers

Title: Manager, C&I DER Delivery Manager

Department: Customer Energy and Transportation Solutions

Telephone: (612) 321-3186

Date: July 18, 2025

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Xcel Energy	Information Request No.	2
Docket No.:	E002/M-23-335, E002/M-13-867	
Response To:	Minnesota Solar Energy Industries Association	
Requestor:	Curtis Zaun	
Date Received:	July 8, 2025	

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
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7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2025 IT/Billing Forecast, Xcel estimated an

expense of \$250,000. Please provide a detailed breakdown of all of the costs that went into this Forecast including, but not limited to: 1) a detailed description of each task that will be performed, including a breakdown of how much is estimated for labor costs and how much is for non-labor costs; 2) for labor costs, please provide the hours and cost estimated for each task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours estimated each employee or contractor is expected work on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the estimated amount of the cost. For each estimate, please provide the basis for the estimate/forecast and the amount of time or money on an annual basis. In addition, please explain any increase or decrease from the previous year. For example, why is the 2025 Forecast \$250,000 when the previous year expense was \$27,384?

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the IR as appropriate.

- 1) Attachment A to our Initial Comments included updated cost information to support the CSG participation fee. We provide a subset of that information in Table 1 below.

Table 1: Participation Fees

EXPENSES	Participation Fees					
	2024 <i>Actual</i>	2025 <i>Forecast</i>	2026 <i>Forecast</i>	2027 <i>Forecast</i>	2028 <i>Forecast</i>	2029 <i>Forecast</i>
1. Beginning Balance	\$ -	\$ 745,931	\$ 1,762,613	\$ 1,983,847	\$ 2,161,783	\$ 1,247,020
<u>2. Participation Fees</u>						
2a. Department of Commerce ¹	\$ 961,000	\$ 961,000	\$ 961,000	\$ 961,000	\$ 961,000	\$ 961,000
2b. Annual Marketing ²	\$ -	\$ 30,000	\$ 30,543	\$ 31,096	\$ 31,659	\$ 32,232
2c. IT/Billing Annual	\$ 27,384	\$ 250,000	\$ 203,620	\$ 210,584	\$ 217,786	\$ 225,234
2c. SalesForce Participation Fees ³	\$ 147,312	\$ 118,080	\$ 148,230	\$ 148,230	\$ 148,230	\$ 148,230
3. Subscriber Management ⁴	\$ 92,234	\$ 124,000	\$ 128,241	\$ 132,627	\$ 137,162	\$ 141,853
3. Total Expenses (Lines 1+2a+2b+2c)	\$ 1,227,931	\$ 1,483,080	\$ 1,471,634	\$ 1,483,536	\$ 534,837	\$ 547,549
<u>RECOVERY</u>						
4. Total Allocated MW (Legacy+AMI) ⁵	903	933	1,042	1,088	1,208	1,308
5. Participation Fee per MW ⁶	500	500	1,200	1,200	1,200	1,200
6. Total Collected (Lines 4x5) ⁷	\$ 482,000	\$ 466,398	\$ 1,250,400	\$ 1,305,600	\$ 1,449,600	\$ 1,569,600
End of Year Balance (Lines 3-6)	\$ 745,931	\$ 1,762,613	\$ 1,983,847	\$ 2,161,783	\$ 1,247,020	\$ 224,969

The \$250,000 cost for 2025 was estimated based on historical costs for ongoing changes and maintenance of SalesForce and our billing system to accommodate changing requirements and facilitate opportunities for improvement. These costs differ from 2024 as only the Legacy Program was accounted for in the 2024 actuals.

With a new process launching for Low-to-Moderate Income CSGs, we anticipate these costs will be higher and more in line with costs for a new program. For example, in 2025 one of the costs attributed to “IT/Billing” is the addition of a new banking section in SalesForce to upload specific documentation needed for developer payments as a result of consolidated billing. These documents include W9s and ACH documents that will facilitate processing and completion of paperwork between the utility and CSG developers. These costs were not built per project therefore these details are unavailable.

- 2) Labor costs were not estimated or utilized for the forecast.
- 3) Labor costs were not estimated or utilized for the forecast.
- 4) Labor costs were not estimated or utilized for the forecast.
- 5) Labor costs were not estimated or utilized for the forecast.
- 6) Please see response to item one above.

Preparer: Ryan Bruers
Title: Manager, C&I DER Delivery
Department: Customer Energy and
Transportation Solutions
Telephone: (612) 321-3186
Date: July 18, 2025

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Xcel Energy

Information Request No.

3

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
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5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2026 IT/Billing Forecast, Xcel estimated an

expense of \$203,620. Please provide a detailed breakdown of all of the costs that went into this Forecast including, but not limited to: 1) a detailed description of each task that will be performed, including a breakdown of how much is estimated for labor costs and how much is for non-labor costs; 2) for labor costs, please provide the hours and cost estimated for each task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours estimated each employee or contractor is expected work on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the estimated amount of the cost. For each estimate, please provide the basis for the estimate/forecast and the amount of time or money on an annual basis. In addition, please explain any increase or decrease from the previous year.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the information request (IR) as appropriate.

- 1) Attachment A to our Initial Comments included updated cost information to support the CSG participation fee. We provide a subset of that information in Table 1 below.

Table 1: Participation Fees

EXPENSES	Participation Fees					
	2024 <i>Actual</i>	2025 <i>Forecast</i>	2026 <i>Forecast</i>	2027 <i>Forecast</i>	2028 <i>Forecast</i>	2029 <i>Forecast</i>
1. Beginning Balance	\$ -	\$ 745,931	\$ 1,762,613	\$ 1,983,847	\$ 2,161,783	\$ 1,247,020
<u>2. Participation Fees</u>						
2a. Department of Commerce ¹	\$ 961,000	\$ 961,000	\$ 961,000	\$ 961,000	\$ 961,000	\$ 961,000
2b. Annual Marketing ²	\$ -	\$ 30,000	\$ 30,543	\$ 31,096	\$ 31,659	\$ 32,232
2c. IT/Billing Annual	\$ 27,384	\$ 250,000	\$ 203,620	\$ 210,584	\$ 217,786	\$ 225,234
2c. SalesForce Participation Fees ³	\$ 147,312	\$ 118,080	\$ 148,230	\$ 148,230	\$ 148,230	\$ 148,230
3. Subscriber Management ⁴	\$ 92,234	\$ 124,000	\$ 128,241	\$ 132,627	\$ 137,162	\$ 141,853
3. Total Expenses (Lines 1+2a+2b+2c)	\$ 1,227,931	\$ 1,483,080	\$ 1,471,634	\$ 1,483,536	\$ 534,837	\$ 547,549
<u>RECOVERY</u>						
4. Total Allocated MW (Legacy+AMI) ⁵	903	933	1,042	1,088	1,208	1,308
5. Participation Fee per MW ⁶	500	500	1,200	1,200	1,200	1,200
6. Total Collected (Lines 4x5) ⁷	\$ 482,000	\$ 466,398	\$ 1,250,400	\$ 1,305,600	\$ 1,449,600	\$ 1,569,600
End of Year Balance (Lines 3-6)	\$ 745,931	\$ 1,762,613	\$ 1,983,847	\$ 2,161,783	\$ 1,247,020	\$ 224,969

Future forecasts for 2026 -2029 were derived by beginning with a total of \$200,000 per year, which was lowered from the \$250,000 estimate for 2025 as direct consultation would end for Consolidated Billing by our project team. We then used an escalation for non-labor of 1.81% to increase the cost over a five-year period as an

estimate. Therefore, as noted in Attachment A, the 2026 estimate used the \$200,000 plus a 1.81 percent escalation. The same mathematical equation was used for 2027-2029 where the previous year estimate was used as the baseline and then escalated by 1.81percent. Detailed descriptions of each task that will be performed are unavailable.

- 2) Labor costs were not estimated or utilized for the forecast.
- 3) Labor costs were not estimated or utilized for the forecast.
- 4) Labor costs were not estimated or utilized for the forecast.
- 5) Labor costs were not estimated or utilized for the forecast.
- 6) These costs were not built per project therefore these details are unavailable.
Please see response to item one above.

Preparer: Jessica Peterson
Title: Manager, Product Policy
Department: Customer Energy & Transportation Solutions
Telephone: 612.216.7972
Date: July 18, 2025

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Xcel Energy

Information Request No.

4

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

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6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2027 IT/Billing Forecast, Xcel estimated an

expense of \$210,584. Please provide a detailed breakdown of all of the costs that went into this Forecast including, but not limited to: 1) a detailed description of each task that will be performed, including a breakdown of how much is estimated for labor costs and how much is for non-labor costs; 2) for labor costs, please provide the hours and cost estimated for each task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours estimated each employee or contractor is expected work on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the estimated amount of the cost. For each estimate, please provide the basis for the estimate/forecast and the amount of time or money on an annual basis. In addition, please explain any increase or decrease from the previous year.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the IR as appropriate.

Please see our response to MnSEIA Information Request Number 3.

Preparer: Jessica Peterson
Title: Manager, Product Policy
Department: Customer Energy and Transportation Solutions
Telephone: 612-216-7972
Date: July 18, 2025

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Xcel Energy

Information Request No.

5

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

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Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2028 IT/Billing Forecast, Xcel estimated an

expense of \$217,786. Please provide a detailed breakdown of all of the costs that went into this Forecast including, but not limited to: 1) a detailed description of each task that will be performed, including a breakdown of how much is estimated for labor costs and how much is for non-labor costs; 2) for labor costs, please provide the hours and cost estimated for each task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours estimated each employee or contractor is expected work on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the estimated amount of the cost. For each estimate, please provide the basis for the estimate/forecast and the amount of time or money on an annual basis. In addition, please explain any increase or decrease from the previous year.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the IR as appropriate.

Please see our response to MnSEIA Information Request Number 3.

Preparer: Jessica Peterson
Title: Manager, Product Policy
Department: Customer Energy and
Transportation Solutions
Telephone: 612-216-7972
Date: July 18, 2025

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Xcel Energy

Information Request No.

6

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

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Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2029 IT/Billing Forecast, Xcel estimated an

expense of \$225,234. Please provide a detailed breakdown of all of the costs that went into this Forecast including, but not limited to: 1) a detailed description of each task that will be performed, including a breakdown of how much is estimated for labor costs and how much is for non-labor costs; 2) for labor costs, please provide the hours and cost estimated for each task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours estimated each employee or contractor is expected work on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the estimated amount of the cost. For each estimate, please provide the basis for the estimate/forecast and the amount of time or money on an annual basis. In addition, please explain any increase or decrease from the previous year. Please provide all documentation and information that supports this forecast.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the IR as appropriate.

Please see our response to MnSEIA Information Request Number 3.

Preparer: Jessica Peterson
Title: Manager, Product Policy
Department: Customer Energy and Transportation Solutions
Telephone: 612-216-7972
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Xcel Energy

Information Request No.

7

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
3. For each separate information request, please identify the individual responsible for providing the response.
4. In producing documents and written responses pursuant to these information requests, designate and restate the request and subpart thereof in response to which each document or response is produced. You may answer under the portion designated “Response.”
5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For 2024 the Actual Expenses for Subscriber

Management was \$92,234. Please provide a detailed breakdown of all of the costs that went into this Actual Expense including, but not limited to: 1) a detailed description of each task that was performed or cost related to this expense; 2) the hours and cost allocated for each task; 3) the number of employees or contractors assigned to each task; 4) the job title, qualifications, and pay rate for each employee or contractor assigned to each task; and, 5) the number of hours each employee or contractor is worked on each task. Please provide all information and documentation that supports this expense.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the information request (IR) as appropriate.

- 1) Attachment A to our Initial Comments included updated cost information to support the CSG participation fee. We provide a subset of that information in Table 1 below.

Table 1: Participation Fees

EXPENSES	Participation Fees					
	2024 <i>Actual</i>	2025 <i>Forecast</i>	2026 <i>Forecast</i>	2027 <i>Forecast</i>	2028 <i>Forecast</i>	2029 <i>Forecast</i>
1. Beginning Balance	\$ -	\$ 745,931	\$ 1,762,613	\$ 1,983,847	\$ 2,161,783	\$ 1,247,020
<u>2. Participation Fees</u>						
2a. Department of Commerce ¹	\$ 961,000	\$ 961,000	\$ 961,000	\$ 961,000	\$ 31,659	\$ 32,232
2b. Annual Marketing ²	\$ -	\$ 30,000	\$ 30,543	\$ 31,096	\$ 217,786	\$ 225,234
2c. IT/Billing Annual	\$ 27,384	\$ 250,000	\$ 203,620	\$ 210,584	\$ 148,230	\$ 148,230
2c. SalesForce Participation Fees ³	\$ 147,312	\$ 118,080	\$ 148,230	\$ 148,230	\$ 137,162	\$ 141,853
3. Subscriber Management ⁴	\$ 92,234	\$ 124,000	\$ 128,241	\$ 132,627	\$ 534,837	\$ 547,549
<u>RECOVERY</u>						
4. Total Allocated MW (Legacy+AMI) ⁵	903	933	1,042	1,088	1,208	1,308
5. Participation Fee per MW ⁶	500	500	1,200	1,200	1,200	1,200
6. Total Collected (Lines 4x5) ⁷	\$ 482,000	\$ 466,398	\$ 1,250,400	\$ 1,305,600	\$ 1,449,600	\$ 1,569,600
End of Year Balance (Lines 3-6)	\$ 745,931	\$ 1,762,613	\$ 1,983,847	\$ 2,161,783	\$ 1,247,020	\$ 224,969

The Subscriber Management cost of \$92,234 is for staff augmentation to support the community solar garden program. Tasks include approving new garden applications, assisting with subscriber related questions including working through the portal steps, working through the Material Modification process, pulling monthly reports, evaluating Section 10 tariff requirements so CSGs can energize, working with developers to address subscriber issues and allocations, and fixing any errors that pop up in the portal and need to be manually addressed.

- 2) The Company does not track hours by task for projects such as these.

- 4) The Company objects to providing specific employee or consulting resource information as being overly burdensome, unreasonably broad, and falling within the scope of information that we have a contractual duty to protect.
 - 5) The Company does not track hours by task for projects such as these.
-

Preparer: Ryan Bruers
Title: Manager, C&I DER Delivery Manager
Department: Customer Energy and Transportation Solutions
Telephone: (612) 321-3186
Date: July 18, 2025

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Xcel Energy

Information Request No.

8

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
 2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
 3. For each separate information request, please identify the individual responsible for providing the response.
 4. In producing documents and written responses pursuant to these information requests, designate and restate the request and subpart thereof in response to which each document or response is produced. You may answer under the portion designated "Response."
 5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
 6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
 7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
 8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is "trade secret" please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2025 Subscriber Management Forecast, Xcel

estimated an expense of \$124,000. Please provide a detailed breakdown of all of the costs that went into this Forecast including, but not limited to: 1) a detailed description of each task that will be performed, including a breakdown of how much is estimated for labor costs and how much is for non-labor costs; 2) for labor costs, please provide the hours and cost estimated for each task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours estimated each employee or contractor is expected work on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the estimated amount of the cost. For each estimate, please provide the basis for the estimate/forecast and the amount of time or money on an annual basis. In addition, please explain any increase or decrease from the previous year. And please provide all documentation and information that supports this forecast.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the information requests (IR) as appropriate.

- 1) Attachment A to our Initial Comments included updated cost information to support the CSG participation fee. We provide a subset of that information in Table 1 below.

Table 1: Participation Fees

EXPENSES	Participation Fees					
	2024 <i>Actual</i>	2025 <i>Forecast</i>	2026 <i>Forecast</i>	2027 <i>Forecast</i>	2028 <i>Forecast</i>	2029 <i>Forecast</i>
1. Beginning Balance	\$ -	\$ 745,931	\$ 1,762,613	\$ 1,983,847	\$ 2,161,783	\$ 1,247,020
2. Participation Fees						
2a. Department of Commerce ¹	\$ 961,000	\$ 961,000	\$ 961,000	\$ 961,000	\$ 31,659	\$ 32,232
2b. Annual Marketing ²	\$ -	\$ 30,000	\$ 30,543	\$ 31,096	\$ 217,786	\$ 225,234
2c. IT/Billing Annual	\$ 27,384	\$ 250,000	\$ 203,620	\$ 210,584	\$ 148,230	\$ 148,230
2c. SalesForce Participation Fees ³	\$ 147,312	\$ 118,080	\$ 148,230	\$ 148,230	\$ 137,162	\$ 141,853
3. Subscriber Management ⁴	\$ 92,234	\$ 124,000	\$ 128,241	\$ 132,627	\$ 534,837	\$ 547,549
3. Total Expenses (Lines 1+2a+2b+2c)	\$ 1,227,931	\$ 1,483,080	\$ 1,471,634	\$ 1,483,536	\$ 534,837	\$ 547,549
RECOVERY						
4. Total Allocated MW (Legacy+AMI) ⁵	903	933	1,042	1,088	1,208	1,308
5. Participation Fee per MW ⁶	500	500	1,200	1,200	1,200	1,200
6. Total Collected (Lines 4x5) ⁷	\$ 482,000	\$ 466,398	\$ 1,250,400	\$ 1,305,600	\$ 1,449,600	\$ 1,569,600
End of Year Balance (Lines 3-6)	\$ 745,931	\$ 1,762,613	\$ 1,983,847	\$ 2,161,783	\$ 1,247,020	\$ 224,969

The Subscriber Management fee is for contract labor to support the community solar garden programs. The 2025 estimate assumes one additional contractor is added in 2025 to support the LMI CSG program. The forecasted amounts for 2026-2029

started with the previous year's estimate (i.e., \$124,000 baseline for 2026) and were then increased using a labor escalation of 3.43% for each year. See our response to MnSEIA Information Request Number 7 for information on tasks.

- 2) This amount was estimated and therefore these details are not available.
- 3) Please see above response to item number one.
- 4) The Company objects to providing specific employee or consulting resource information as being overly burdensome, unreasonably broad, and falling within the scope of information that we have a contractual duty to protect.
- 5) This amount was estimated and therefore these details are not available.

Preparer: Jessica Peterson
Title: Manager, Product Policy
Department: Customer Energy and Transportation Solutions
Telephone: 612-216-7972
Date: July 18, 2025

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Xcel Energy

Information Request No.

9

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
3. For each separate information request, please identify the individual responsible for providing the response.
4. In producing documents and written responses pursuant to these information requests, designate and restate the request and subpart thereof in response to which each document or response is produced. You may answer under the portion designated “Response.”
5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2026 Subscriber Management Forecast, Xcel

estimated an expense of \$128,241. Please provide a detailed breakdown of all of the costs that went into this Forecast including, but not limited to: 1) a detailed description of each task that will be performed, including a breakdown of how much is estimated for labor costs and how much is for non-labor costs; 2) for labor costs, please provide the hours and cost estimated for each task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours estimated each employee or contractor is expected work on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the estimated amount of the cost. For each estimate, please provide the basis for the estimate/forecast and the amount of time or money on an annual basis. In addition, please explain any increase or decrease from the previous year. And please provide all documentation and information that supports this forecast.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the IR as appropriate.

Please see our response to MnSEIA Information Request Number 8.

Preparer: Jessica Peterson
Title: Manager, Product Policy
Department: Customer Energy and Transportation Solutions
Telephone: 612-216-7972
Date: July 18, 2025

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Xcel Energy

Information Request No.

10

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
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5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
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7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2027 Subscriber Management Forecast, Xcel

estimated an expense of \$132,627. Please provide a detailed breakdown of all of the costs that went into this Forecast including, but not limited to: 1) a detailed description of each task that will be performed, including a breakdown of how much is estimated for labor costs and how much is for non-labor costs; 2) for labor costs, please provide the hours and cost estimated for each task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours estimated each employee or contractor is expected work on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the estimated amount of the cost. For each estimate, please provide the basis for the estimate/forecast and the amount of time or money on an annual basis. In addition, please explain any increase or decrease from the previous year. And please provide all documentation and information that supports this forecast.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the IR as appropriate.

Please see our response to MnSEIA Information Request Number 8.

Preparer: Jessica Peterson
Title: Manager, Product Policy
Department: Customer Energy and
Telephone: 612-216-7972
Date: July 18, 2025

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Xcel Energy

Information Request No.

11

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
3. For each separate information request, please identify the individual responsible for providing the response.
4. In producing documents and written responses pursuant to these information requests, designate and restate the request and subpart thereof in response to which each document or response is produced. You may answer under the portion designated “Response.”
5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2028 Subscriber Management Forecast, Xcel

estimated an expense of \$137,162. Please provide a detailed breakdown of all of the costs that went into this Forecast including, but not limited to: 1) a detailed description of each task that will be performed, including a breakdown of how much is estimated for labor costs and how much is for non-labor costs; 2) for labor costs, please provide the hours and cost estimated for each task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours estimated each employee or contractor is expected work on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the estimated amount of the cost. For each estimate, please provide the basis for the estimate/forecast and the amount of time or money on an annual basis. In addition, please explain any increase or decrease from the previous year. And please provide all documentation and information that supports this forecast.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the IR as appropriate.

Please see our response to MnSEIA Information Request Number 8.

Preparer: Jessica Peterson
Title: Manager, Product Policy
Department: Customer Energy and Transportation Solutions
Telephone: 612-216-7972
Date: July 18, 2025

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Xcel Energy

Information Request No.

12

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
3. For each separate information request, please identify the individual responsible for providing the response.
4. In producing documents and written responses pursuant to these information requests, designate and restate the request and subpart thereof in response to which each document or response is produced. You may answer under the portion designated “Response.”
5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2029 Subscriber Management Forecast, Xcel

estimated an expense of \$141,853. Please provide a detailed breakdown of all of the costs that went into this Forecast including, but not limited to: 1) a detailed description of each task that will be performed, including a breakdown of how much is estimated for labor costs and how much is for non-labor costs; 2) for labor costs, please provide the hours and cost estimated for each task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours estimated each employee or contractor is expected work on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the estimated amount of the cost. For each estimate, please provide the basis for the estimate/forecast and the amount of time or money on an annual basis. In addition, please explain any increase or decrease from the previous year. And please provide all documentation and information that supports this forecast.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the IR as appropriate.

Please see our response to MnSEIA Information Request Number 8.

Preparer: Jessica Peterson
Title: Manager, Product Policy
Department: Customer Energy and
Telephone: 612-216-7972
Date: July 18, 2025

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Xcel Energy

Information Request No.

13

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
3. For each separate information request, please identify the individual responsible for providing the response.
4. In producing documents and written responses pursuant to these information requests, designate and restate the request and subpart thereof in response to which each document or response is produced. You may answer under the portion designated “Response.”
5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For 2024 the Actual Expenses for the SalesForce

Participation Fee was \$147,312. Is this fee exclusively for the portions of Xcel's portal that are used by CSG developers and other CSG participants or does it cover software or functionality used by others? Please provide all information and documentation that supports this expense, especially anything that supports the fee is directly related to software that is exclusively used by CSG developers and other CSG participants.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the information request (IR) as appropriate.

Yes, the \$147,312 is for the Salesforce user licenses for CSG developers and participants to use the application portal. This cost applies only to CSG developers/participants and does not include licenses for other users. We cannot provide any further documentation in response to this information request as it is confidential information. We do note that we have provided these details to the Department of Commerce subject to confidentiality provisions.

Preparer: Ryan Bruers
Title: Manager, C&I DER Delivery Manager
Department: Customer Energy and Transportation Solutions
Telephone: (612) 321-3186
Date: July 18, 2025

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Xcel Energy

Information Request No.

14

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
3. For each separate information request, please identify the individual responsible for providing the response.
4. In producing documents and written responses pursuant to these information requests, designate and restate the request and subpart thereof in response to which each document or response is produced. You may answer under the portion designated “Response.”
5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2025 SalesForce Participation Fees Forecast,

Xcel estimated an expense of \$118,080. Please provide the basis for the estimate/forecast and explain any increase or decrease from the previous year. And please provide all documentation and information that supports this forecast.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the information requests (IR) as appropriate.

The Company estimated the 2025 SalesForce participation fees by identifying how many licenses were used by CSG developers/participants as of May 2025. For future forecasting purposes, the Company estimated the cost of future Minnesota Legacy and LMI CSG licenses by multiplying the cost per user (from SalesForce) times the number of licenses used exclusively in Minnesota. For licenses used across our service companies, we split the cost equally per jurisdiction.

Due to the confidential nature of this information the Company cannot provide further detail in response to this information request around the number of licenses or the cost per license. However, we have provided more detailed information to the Department of Commerce subject to confidentiality provisions.

Preparer: Jessica Peterson
Title: Manager, Product Policy
Department: Customer Energy and
Transportation Solutions
Telephone: 612-216-7972
Date: July 18, 2025

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Xcel Energy

Information Request No.

15

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
3. For each separate information request, please identify the individual responsible for providing the response.
4. In producing documents and written responses pursuant to these information requests, designate and restate the request and subpart thereof in response to which each document or response is produced. You may answer under the portion designated “Response.”
5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

Xcel has requested that the annual CSG participation fee be increased from \$500 to \$1200 based on the expenses listed in Attachment A to its Initial Comments filed in docket 23-335 on June 20, 2025. For the 2026 through 2029 SalesForce Participation

Fees Forecast, Xcel estimated an expense of \$148,230. Please provide the basis for these estimates/forecasts and explain the increase from the previous year. And please provide all documentation and information that supports this forecast.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the information request (IR) as appropriate.

The Company estimated the forecast for Salesforce participation fees in years 2026-2029 by increasing the number of licenses based on how many additional licenses we may see as a result of new Low-to Moderate Income Community Solar Gardens achieving completion in 2025/2026. We maintained the same annual cost forecast \$148,230 through 2026-2029 as it is unclear as to how many CSG projects will be moving forward into construction. We may adjust the annual participation fee costs up or down in the future with more accurate details.

Due to the confidential nature of this information the Company cannot provide further detail in response to this information request around the number of licenses or the cost per license. However, we have provided more detailed information to the Department of Commerce subject to confidentiality provisions.

Preparer: Jessica Peterson
Title: Manager, Product Policy
Department: Customer Energy and Transportation Solutions
Telephone: 612-216-7972
Date: July 18, 2025

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Xcel Energy

Information Request No.

16

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
3. For each separate information request, please identify the individual responsible for providing the response.
4. In producing documents and written responses pursuant to these information requests, designate and restate the request and subpart thereof in response to which each document or response is produced. You may answer under the portion designated “Response.”
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6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

In its May 5, 2025, Response at page 5 (Table 3), Xcel states that the costs for the Application Portal updates more than doubled from Xcel's Forecast- from \$800,000 estimated to \$1,625,060 actual. Xcel described the work associated with this cost

as, "Add additional functionality to SalesForce for projects over 1 MW and create pathways to collect information required by Minn. Legislation." Please provide a more detailed breakdown of this work, including, but not limited to: 1) a detailed description of each task and cost that was part of the work, including a breakdown of how much was for labor costs and how much was for non-labor costs; 2) for labor costs, please provide a detailed description of the task, the number of hours it took to complete, and the total cost for the specific task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours each employee or contractor worked on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the amount of the cost. Please provide all documentation and information that supports this expense.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the information request (IR) as appropriate.

Our May 5, 2025 Response included the following table:

**Table 1:
System Costs to Support the LMI CSG Program (Actual vs. Forecast)**

Category	Upfront System Costs (Forecast)	Upfront System Costs (Actual ²)
Application Portal	\$800,000	\$1,625,060
Integration of Systems	\$2,200,000	\$553,802
Consolidated Billing	\$200,000	\$1,610,473
Total	\$3,200,000	\$3,789,335

Initially, the Company was planning to use a separate application portal for interconnection applications that were going to participate in the LMI CSG program. The Company also proposed to complete implementation of consolidated billing by January 1, 2026. However, per the Commission's December 28, 2023 Order, the Company was required to implement consolidated billing no later than January 1, 2025. In addition, the Commission's May 30, 2024 Order required the Company to use its general Distributed Generation application portal for LMI CSG applications until they were approved by the Department to the program. As a result, the Company had to expedite consolidated billing implementation and adopt a different approach for LMI CSG applications.

- 1) The category of “Application Portal” covers work that was necessary to develop and complete SalesForce functionality for the LMI CSG program. Other programs, projects, or distributed energy resources do not benefit from the additional portal functionality built specifically for the LMI CSG program.

We provide a list of the functionality added as part of the “Application Portal” category in the table below. The Company does not have cost allocations broken by individual functionality as we track costs at a project level.

Table 1: “Application Portal” Functionality

Requirement
Assess \$4,125/MW Fee
Dept. of Commerce Approval Checkpoint
LMI Specific Actions and Validations
Systematic Document Uploads
Allow PMO Manual overrides
Add, Change, and Remove Subscribers
Set or Change Customer Group
Set or Change Subscriber Allocation
Run Subscriber Validations
Garden Operator Edits Locked for Last 4 Business Days of Each month
Automatically unsubscribe move outs and reallocate to Backup Subscriber
Garden and Subscriber Validations
Monthly Enrollment and Allocations files
Set Customer Group as Backup Subscriber
Run Backup Subscriber-Specific Validations
Automatically reallocate to and from Backup Subscriber
Updated Monthly Owners Report
CRS sends monthly delinquency files to Salesforce
Set or change delinquency flag in Salesforce
Track delinquency changes
Subscriber opt-in or opt-out of Consolidated Billing
Set Credit Percent

In addition, the project team hired to complete this work not only conducted blueprinting, software build, and testing, but also provided training materials for developers and documentation for the program teams to manage these new requirements.

The Company is unable to break out labor vs. non-labor for each of the categories noted above (Application Portal, Integration of Systems, Consolidated Billing).

However, in total approximately 96 percent of the total cost was labor-related (~\$3.5 M) as the teams implemented the functionality required for each category.

- 2) The Company does not have cost allocations broken by individual functionality as we track costs at a project level.
 - 3-5) The Company objects to providing specific employee or consulting resource information as being overly burdensome, unreasonably broad, and falling within the scope of information that we have a contractual duty to protect.
 - 6) In addition to labor, costs include software solutions (often for testing) and small miscellaneous charges.
-

Preparer:	Jessica Peterson	Jacob Williams
Title:	Manager, Product Policy	Manager, Project Management
Department:	Customer Energy and Transportation Solutions	IT Customer Experience
Telephone:	612-216-7972	612-330-5819
Date:	July 18, 2025	July 18, 2025

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 Public Document

Xcel Energy

Information Request No.

17

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
3. For each separate information request, please identify the individual responsible for providing the response.
4. In producing documents and written responses pursuant to these information requests, designate and restate the request and subpart thereof in response to which each document or response is produced. You may answer under the portion designated “Response.”
5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

In its May 5, 2025, Response at page 5 (Table 3), Xcel states that the costs for Integration of Systems cost less than half of Xcel's Forecast- from \$2,200,000 estimated to \$553,802 actual. Xcel described the work associated with this cost as

“Add subscriber detail requirements to SalesForce to transfer to billing systems.” Please provide a more detailed breakdown of this work, including, but not limited to: 1) a detailed description of each task and cost that was part of the work, including a breakdown of how much was for labor costs and how much was for non-labor costs; 2) for labor costs, please provide a detailed description of the task, the number of hours it took to complete, and the total cost for the specific task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours each employee or contractor worked on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the amount of the cost. Please provide all documentation and information that supports this expense.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the information request (IR) as appropriate.

Our May 5, 2025 Response included the following table:

**Table 1:
System Costs to Support the LMI CSG Program (Actual vs. Forecast)**

Category	Upfront System Costs (Forecast)	Upfront System Costs (Actual ²)
Application Portal	\$800,000	\$1,625,060
Integration of Systems	\$2,200,000	\$553,802
Consolidated Billing	\$200,000	\$1,610,473
Total	\$3,200,000	\$3,789,335

Initially, the Company was planning to use a separate application portal for interconnection applications that were going to participate in the LMI CSG program. The Company also proposed to complete implementation of consolidated billing by January 1, 2026. However, per the Commission’s December 28, 2023 Order, the Company was required to implement consolidated billing no later than January 1, 2025. In addition, the Commission’s May 30, 2024 Order required the Company to use its general Distributed Generation application portal for LMI CSG applications until they were approved by the Department to the program. As a result, the Company had to expedite consolidated billing implementation and adopt a different approach for LMI CSG applications.

Between August 28, 2023 and May 2024 when the project work began in earnest, we adjusted the number of hours worked, the requirements and scope of work associated

with the “Integration of Systems” category, and how required work items were classified between “Application Portal” and “Integration of Systems” categories, as many of these items were developed in SalesForce but also had to be integrated or connected with our billing system. These adjustments resulted in reduced cost for the “Integration of Systems” category. Of note, costs for the “Application Portal” and “Integration of Systems” categories together were estimated as \$3 million and the work was completed under budget at \$2.2 million.

- 1) The category of “Integration of Systems” covers work completed to add subscriber detail requirements to SalesForce and transfer data between SalesForce and our billing system for the LMI CSG program. Other programs, projects, or distributed energy resources do not benefit from the additional portal functionality built specifically for the LMI CSG program. The Company does not have cost allocations broken by individual functionality as we track costs at a project level

We provide a list of the functionality added as part of the “Integration of Systems” category in the table below.

Table 2: “Integration of Systems” Functionality

Requirement
Add, Change, and Remove Subscribers
Set or Change Customer Group
Set or Change Subscriber Allocation
Monthly Enrollment and Allocations files
Set Customer Group as Backup Subscriber
Updated Monthly Owners Report
CRS sends monthly delinquency files to Salesforce
Set or change delinquency flag in Salesforce
Track delinquency changes
Automatically reallocate to Backup Subscribers
Subscriber opt-in or opt-out of Consolidated Billing
Set Credit Percent
Monthly Enrollment and Allocation Files

The Company is unable to break out labor vs. non-labor for each of the categories noted above (Application Portal, Integration of Systems, Consolidated Billing). However, in total approximately 96 percent of the total cost was labor-related (~\$3.5 M) as the teams implemented the functionality required for each category.

- 2) The Company does not have cost allocations broken by individual functionality as we track costs at a project level.

- 3-5) The Company objects to providing specific employee or consulting resource information as being overly burdensome, unreasonably broad, and falling within the scope of information that we have a contractual duty to protect.
- 6) In addition to labor, costs include software solutions (often for testing) and small miscellaneous charges.
-

Preparer:	Jessica Peterson	Jacob Williams
Title:	Manager, Product Policy	Manager, Project Management
Department:	Customer Energy and Transportation Solutions	IT Customer Experience
Telephone:	612-216-7972	612-330-5819
Date:	July 18, 2025	July 18, 2025

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Xcel Energy

Information Request No.

18

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
2. Unless noted, the documents that production is sought for shall include all documents dated, prepared, sent, or received during the designated period.
3. For each separate information request, please identify the individual responsible for providing the response.
4. In producing documents and written responses pursuant to these information requests, designate and restate the request and subpart thereof in response to which each document or response is produced. You may answer under the portion designated “Response.”
5. Whenever these information requests specifically request an answer, an answer is required and the production of documents in lieu thereof will not substitute for an answer.
6. As to any information request consisting of a number of separate subdivisions, or related parts, sub-parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate information request.
7. Please provide all underlying data, inputs, tools and spreadsheets used to calculate any requested numbers, figures or data sets.
8. All answers should be provided within ten (10) business days from when you received this document. If an answer cannot be provided within that time period, please send notice and request an extension. If the answer is “trade secret” please post that in the docket as trade secret so that the Commission may see the answer.

In its May 5, 2025, Response at page 5 (Table 3), Xcel states that system costs for Consolidated Billing increased more than 800% from Xcel’s Forecast- from \$200,000 estimated to \$1,610,473 actual. Xcel described the work associated with this cost as

“Add functionality between SalesForce and billing.” Please provide a more detailed breakdown of this work, including, but not limited to: 1) a detailed description of each task and cost that was part of the work, including a breakdown of how much was for labor costs and how much was for non-labor costs; 2) for labor costs, please provide a detailed description of the task, the number of hours it took to complete, and the total cost for the specific task; 3) for labor costs, please provide the number of employees or contractors assigned to each task; 4) for labor costs, please provide the job title, qualifications, and pay rate for each employee or contractor assigned to each task; 5) for labor costs, please provide the number of hours each employee or contractor worked on each task; and, 6) for non-labor costs, please provide a detailed description of the cost, including the amount of the cost. Please provide all documentation and information that supports this expense.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8 and will respond to the information request (IR) as appropriate.

Our May 5, 2025 Response included the following table:

**Table 1:
System Costs to Support the LMI CSG Program (Actual vs. Forecast)**

Category	Upfront System Costs (Forecast)	Upfront System Costs (Actual ²)
Application Portal	\$800,000	\$1,625,060
Integration of Systems	\$2,200,000	\$553,802
Consolidated Billing	\$200,000	\$1,610,473
Total	\$3,200,000	\$3,789,335

The Company proposed to complete implementation of consolidated billing by January 1, 2026. However, per the Commission’s December 28, 2023 Order, the Company was required to implement consolidated billing no later than January 1, 2025. As a result, the timeline for completed work, whether it was blueprinting, design, software development or developing process documentation, was limited. In a limited timeframe, additional people must be hired to conduct the work necessary for the project. This increases resource costs, and the number of hours spent on the project to meet the required deadline.

- 1) The category of “Consolidated Billing” covers work completed to add subscriber detail requirements directly to our billing system for the LMI CSG program. We provide a list of the functionality added as part of the “Consolidated Billing” category in the table below. The Company does not

have cost allocations broken by individual functionality as we track costs at a project level

Table 2: “Consolidated Billing” Functionality

Requirement
Add, Change, and Remove Subscribers
Set or Change Customer Group
Set or Change Subscriber Allocations
Run Subscriber Validations
Monthly Enrollment and Allocation Files
Customer Group-level pricing applied
Generation Credit included on bill
Set Customer Group as Back-up Subscriber
System Demand Charge Credit Billing
Update Monthly Owners Report (connection between systems)
CRS sends monthly delinquency file to Salesforce
Track delinquency changes
Subscriber opt-in or opt-out to consolidated billing
Set credit percent
Monthly enrollment allocation files
Calculate debit and credit amount
Assess sales tax on debit amount (built as a requirement, but not used)
Include Subscription Fee debit amount
Remit Subscription Fee to the Garden Operator

The Company is unable to break out labor vs. non-labor for each of the categories noted above (Application Portal, Integration of Systems, Consolidated Billing). However, in total approximately 96 percent of the total cost was labor-related (~\$3.5 M) as the teams implemented the functionality required for each category.

- 2) The Company does not have cost allocations broken by individual functionality as we track costs at a project level.
- 3-5) The Company objects to providing specific employee or consulting resource information as being overly burdensome, unreasonably broad, and falling within the scope of information that we have a contractual duty to protect.
- 6) In addition to labor, costs include software solutions (often for testing) and small miscellaneous charges.

Preparer:	Jessica Peterson	Jacob Williams
Title:	Manager, Product Policy	Manager, Project Management
Department:	Customer Energy and Transportation Solutions	IT Customer Experience
Telephone:	612-216-7972	612-330-5819
Date:	July 18, 2025	July 18, 2025

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Xcel Energy

Information Request No.

19

Docket No.: E002/M-23-335, E002/M-13-867

Response To: Minnesota Solar Energy Industries Association

Requestor: Curtis Zaun

Date Received: July 8, 2025

Question:

The following apply to all information requests set forth herein:

1. These requests for documents and responses are continuing in character. You must file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
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Xcel included the \$961,000 cost for the Minnesota Department of Commerce to administer the LMI CSG program in the \$500 annual CSG participation fee approved by the Minnesota Public Utilities Commission on December 28, 2023? Please provide

the legal basis for including this expense in the annual CSG participation fee, with cites to the specific legal authority. Xcel included the \$961,000 cost for the Minnesota Department of Commerce to administer the LMI CSG program in Xcel's 2025 through 2027 Forecast included as Attachment A to its June 2025, Initial Comments. Please provide the legal basis for including this expense in the Forecast for annual CSG participation fee, with cites to the specific legal authority.

Response:

Xcel Energy objects to the generic instructions in paragraphs 1 through 8, and will respond to the information request (IR) as appropriate.

Xcel Energy objects to this IR, as it seeks to circumvent the comment schedule set by the Commission's April 4, 2025 Notice of Comment Period in this docket. The Notice identified the topics open for comment, with designated dates for the Xcel Energy response, and dates for participants to file Initial Comments and Reply Comments. If there were concerns with the ability or propriety of obtaining cost recovery through the Participation Fee of administrative costs such as the assessments by the Department as authorized by state legislation, this should have been presented by MnSEIA in its Initial Comments. This would have allowed Xcel Energy to respond in its Reply Comments, which are currently due on July 31, 2025.

Instead, MnSEIA did not raise this issue in its Initial Comments. The Company notes that Nokomis Energy in its Initial Comments has provided a legal challenge on the ability of Xcel Energy to recover these costs through the Participation Fee. Under the Notice of Comment Period, Xcel Energy is allowed to reply to this argument in its Reply Comments. This IR is improper, as it (1) seeks to have Xcel Energy essentially submit its reply to the issues raised by Nokomis Energy in the procedural comments process prior to the time that Reply Comments are due, and (2) seeks to have Xcel Energy provide a legal analysis outside of the procedural process set forth in the Notice of Comment Period.

MnSEIA's attempt to use IRs to introduce new issues outside of the comment schedule set by the Commission is not a proper use of the discovery process.

Preparer: James Denniston
Title: Assistant General Counsel
Department: Legal
Telephone: 612-215-4656
Date: July 18, 2025